

# EXHIBIT B

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

ESTATE OF GEORGE BERNARD WORRELL, JR.,

Plaintiff,

-vs-

Case No. 4:22-cv-11009-FKB-DRG  
District Judge F. Kay Behm  
Magistrate Judge: David R. Grand

THANG, INC. and GEORGE CLINTON,

Defendants.

\_\_\_\_\_ /

The deposition of JUDITH WORRELL, a witness in  
the above-entitled cause, taken before Suzanne Lynn  
Bonarek, Certified Shorthand Reporter and Notary Public,  
Wayne County, Michigan, at 500 Woodward Avenue, Detroit,  
Michigan, on the 27th day of August, 2024 commencing at or  
about 9:02 a.m., pursuant to the Federal Rules of Civil  
Procedure.

APPEARANCES:

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BY: MR. DANIEL QUICK

Appearing on behalf of Plaintiff

SCHENK & BRUETSCH, PLC

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BY: MR. JAMES ALLEN, SR.

Appearing on behalf of Defendants

1 (APPEARANCES CONTINUED) :

2  
3 ALSO PRESENT: Andrew Davis  
4 Audrey Aldrich  
5 George Clinton  
6 Carlon Clinton  
7 Archie Ivy  
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I N D E XWITNESSPAGE

JUDITH WORRELL

Examination by Mr. Allen

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1 Detroit, Michigan

2 Tuesday, August 27, 2024

3 At or about 9:02 a.m.

4 \* \* \*

5 J U D I T H W O R R E L L

6 Having first been duly sworn to tell the truth, was  
7 examined and testified upon her oath as follows:

8 MR. ALLEN: Good morning, Ms. Worrell.

9 We've met briefly yesterday. My name is James Allen,  
10 I'm the attorney representing defendants in this case.  
11 And today is the date that we noticed for your  
12 deposition. And I wanted to make a few introductory  
13 statements and go through a few ground rules to get us  
14 started today, okay.

15 This is the deposition of Judith Worrell  
16 taken pursuant to Notice, for all applicable purposes  
17 under the Federal Court Rules.

18 Ms. Worrell, have you been deposed before?

19 THE WITNESS: I don't think so.

20 MR. ALLEN: Well, then let me go through a  
21 little bit more of an extensive listing of some of the  
22 rules here.

23 Our court reporter, Sue, is going to be  
24 taking down everything that's being said in the  
25 deposition, so my questions, your answers. There may

1 be some objections that Mr. Quick will want to  
2 interject. And it's important in that whole interplay  
3 that, one, your answers be verbal because the court  
4 reporter can't take down nods and gestures; and it's  
5 also important that you listen to the entire question,  
6 so give me a chance to finish the question.

7 And Mr. Quick may have some objections to  
8 make. And if he decides to make an objection, let him  
9 make his objection before you give your answer, okay,  
10 can you do that for me?

11 THE WITNESS: Yes.

12 MR. ALLEN: Okay. We're going to be here  
13 for a little bit of time today so we'll break.  
14 Mr. Quick will I'm sure have some input on when he  
15 wants to break for a quick lunch.

16 But in between all of that if you would  
17 like -- you know, this isn't an interrogation with hot  
18 lights over you. We're just here to get information  
19 out. And if you need to take a break, feel free to  
20 take a break. I only ask, as a courtesy, that the  
21 break not be taken during the course of a question  
22 being pending on the table, okay?

23 THE WITNESS: To the best of my ability,  
24 yes.

25 MR. ALLEN: Thank you. And if you don't

1 understand a question that I ask you, I just ask that  
2 you ask me for some clarification; otherwise I'm going  
3 to assume that you understood my question, okay?

4 THE WITNESS: Yes.

5 MR. ALLEN: And I have a few preliminary  
6 questions about your physical condition today.

7 Is there anything going on physically that  
8 would prevent you from being able to hear and answer  
9 my questions truthfully?

10 THE WITNESS: No.

11 MR. ALLEN: Are you on any form of  
12 medication that would prevent you from answering  
13 truthfully?

14 THE WITNESS: No.

15 MR. ALLEN: And you have no medical  
16 conditions -- I don't need to know what they are, but  
17 you have no medical conditions that would prevent you  
18 from being able to speak truthfully today, correct?

19 THE WITNESS: No.

20 EXAMINATION

21 BY MR. ALLEN:

22 Q Why don't we start with a real simple question. Can  
23 you state and spell your name, for the record.

24 A Judith, J-U-D-I-T-H, Worrell, W-O-R-R-E-L-L. But I go  
25 by Judie, J-U-D-I-E.



1 Q Ms. Worrell, where do you live; what state do you live  
2 in.

3 A Washington.

4 Q And how long you have lived in Washington State?

5 A Since my husband died in 2016.

6 Q And prior to that you lived in New Jersey?

7 A Yes.

8 Q For how many years?

9 A Approximately 24.

10 Q And are you currently employed?

11 A No.

12 Q When was the last position you held?

13 A Bernie's manager and some -- simultaneously as a real  
14 estate agent.

15 Q Let's start with your tenure as Bernie's, your ex --  
16 or, I'm sorry, my apologies, your deceased husband,  
17 Bernie Worrell, --

18 A Yes.

19 Q -- his manager.

20 A Yes.

21 Q And as I've seen in some places, that was a fairly  
22 long position that you held not only as his wife but  
23 as his manager. For approximately how many years did  
24 you manage Mr. Worrell's career?

25 A I'm not exactly sure but we were together almost 50

1           years. That's five O, not 15, five O.

2       Q     So that was from 1966 to 2016; passed away in 2016?

3       A     Roughly.

4       Q     And you met Mr. Worrell in 1966?

5       A     I don't remember the date.

6       Q     And it was Ms. Maxine Brown that introduced you or did  
7           you meet Maxine Brown after you met Bernie Worrell?

8       A     No, I knew Maxine first.

9       Q     You went to an event at her home and Mr. Worrell was  
10           there and that's where you met Mr. Worrell?

11      A     Not quite but close.

12      Q     And how soon after you met Mr. Worrell do you estimate  
13           that you became his manager?

14      A     In the beginning I just helped him with money affairs.  
15           I didn't become a person handling everything until  
16           after we re-married. After the divorce when we  
17           re-married he told me he wanted me to be his manager.

18      Q     Right. And what year were you divorced?

19      A     I don't remember. I'm not good with dates.

20      Q     Okay. Approximately, was it in the '80's or was it in  
21           the '70's?

22      A     Oh, I think it was in the '80's.

23      Q     Okay.

24      A     It was when he started with Talking Heads I think.

25      Q     And I watched an interview you gave last year, a

1 podcast called Truth in Rhythm. Do you recall that?

2 A Uh-huh.

3 Q Okay.

4 A Yes.

5 Q All right. You negotiated Mr. Worrell's first  
6 contract with Mr. Clinton, correct?

7 A Yes.

8 Q All right. And do you recall what year that was?

9 A No.

10 (WHEREUPON Exhibit No. 1  
11 was marked for identification  
12 by the reporter.)

13 Q (Continuing by MR. ALLEN): I've handed you what's  
14 been marked as Exhibit 1. And I'll just advise you  
15 upfront that there are a few pages that are duplicated  
16 because some have some misaligned print. So you'll  
17 see a couple of page twos; one is a partial, the other  
18 is the -- is a fuller version of page two, and a  
19 couple of other pages like that.

20 Have you seen that document before?

21 A Yes.

22 Q Is that the first contract that you negotiated for Mr.  
23 Worrell?

24 A No.

25 Q Okay. Do you have copies of the first contract that

1           you negotiated for Mr. Worrell?

2       A     No, it was verbal.

3       Q     So let's start with that first contract, that verbal  
4           contract you negotiated on behalf of your husband. Do  
5           you have -- the date on that contract is January 1,  
6           1976. Do you have an idea as to when the first verbal  
7           contract was that you negotiated for your husband?

8       A     Not by date but --

9       Q     In relation --

10      A     -- just before Bernie joined he was in --

11      Q     Bermuda.

12      A     -- Bermuda with Maxine. He called me and told me that  
13           George wanted him to come -- would I go meet George at  
14           the Apollo.

15                   I met George at the Apollo, we talked. I  
16           told him Bernie had to have \$200 a week whether or not  
17           he worked. That was the contract, because George --  
18           because he told me he couldn't afford it, and I said  
19           Bernie needed it period. And that was how Bernie went  
20           out. And those were performance only. This was  
21           before we even got into writing, publishing.

22      Q     Okay. So your husband was paid \$200 a week to perform  
23           on Mr. Clinton's records?

24      A     No, he wasn't -- no, he wasn't actually -- let's back  
25           up. I think I said for performance only. And the

1 fact you're saying that that's what he got, no. That  
2 was what the deal was but that's not what George paid.

3 Q Okay. So you negotiated a contract, whether or not --  
4 your testimony is that Mr. Clinton complied with the  
5 contract or not, the contract was that he was going to  
6 be paid a set amount of money per week in exchange for  
7 his services as a performing artist on Mr. Clinton's  
8 records, correct?

9 A No.

10 MR. QUICK: Object to form, --

11 A No, --

12 MR. QUICK: -- mischaracterizes the  
13 testimony.

14 A -- no. Live performances.

15 Q (Continuing by MR. ALLEN): Live performances, okay.  
16 So at some point did the nature of the oral contract  
17 evolve to something else?

18 A You can say it devolved because George didn't live up  
19 to the contract. That was the first of the contracts  
20 he never lived up to.

21 Q In what way was he not living up to the contract?

22 A Paying Bernie.

23 Q Okay. So how long was the oral contract in place  
24 where Mr. Worrell was supposed to be paid \$200 per  
25 week?

1 MR. QUICK: You mean -- when you say in  
2 place, you mean how long was Mr. Worrell actually  
3 paid?

4 Q (Continuing by MR. ALLEN): No. How long, what period  
5 of time approximately did the oral contract that  
6 you're referencing, what period of time was it in  
7 place?

8 MR. QUICK: I'll object to form, calls for  
9 a legal conclusion.

10 MR. ALLEN: You can answer.

11 THE WITNESS: Should I answer that?

12 MR. QUICK: If you're able to. If you're  
13 not, --

14 A Oh, I can answer it. It was in place as long until  
15 Bernie got disgusted that George wasn't paying any.

16 Q (Continuing by MR. ALLEN): Okay. So that --

17 A George wasn't living up to the agreement.

18 Q Okay. So then what happened in terms of the  
19 contractual arrangement, is that when this contract  
20 was negotiated by you?

21 A No, I didn't negotiate this contract.

22 Q Then what replaced the oral contract for \$200 per  
23 week?

24 A Nothing really. I mean you'd have to be more  
25 specific. Nothing replaced the contract that was

1 never lived up to, let me put it that way.

2 Q Okay. Well, there were subsequent contracts. You  
3 stated --

4 A I repeat, that were lived up to. Bernie did what he  
5 was supposed to do, George did not.

6 Q Ma'am, we understand that your --

7 A Okay.

8 Q -- position is that Mr. Clinton didn't live up to his  
9 contractual obligations. What I'm trying to establish  
10 is a timeline for what agreements were in place, and  
11 to the best of your recollection when they were in  
12 place and when -- what periods they applied to.

13 A I don't know how to answer that question so let me  
14 start with the truth.

15 When Bernie first spoke to George about not  
16 getting paid and George told Bernie that he was part  
17 of Thang, everybody -- what he was going to do was  
18 everybody was going to participate as part of Thang.  
19 And when the money started coming in -- because the  
20 money that came in from gigs, he was using for hotels  
21 and God knows whatever else he said.

22 And so Bernie agreed to enter into the  
23 contract with Thang because it was the only way he was  
24 going to get paid. So like a corporation, he was part  
25 of the corporation.

1 Q So how long under that first contract did that  
2 situation endure?

3 A You mean --

4 Q The situation where you say there was an oral contract  
5 in place to pay him \$200 a week, and Mr. Clinton you  
6 say was not paying that \$200 a week. What period of  
7 time does that situation cover?

8 MR. QUICK: I'll object to form, calls for  
9 a legal conclusion and vague.

10 MR. ALLEN: You can answer the question,  
11 ma'am.

12 THE WITNESS: Should I answer that?

13 MR. QUICK: If you understand the question,  
14 you may. If there's something about the question you  
15 don't understand, --

16 THE WITNESS: I don't.

17 MR. QUICK: -- Mr. Allen will clear it up  
18 for you.

19 THE WITNESS: Okay.

20 Q (Continuing by MR. ALLEN): What is it you don't  
21 understand about my question?

22 A I have already told you that I negotiated that George  
23 was supposed to, and he agreed, was supposed to be  
24 paying Bernie \$200 a week for performances and that  
25 was to go on.



1 But when Bernie got to Detroit for the  
2 first gig at The 20 Grand and then we got stranded in  
3 Detroit, it became apparent from the way things were  
4 going with George, so it just kind of faded. In other  
5 words, if you have a contract with somebody and they  
6 don't live up to it, how can you say when it ends.

7 Q Okay. So let me try it this way. At some point the  
8 oral contract for \$200 per week was replaced with  
9 something else?

10 A No. At some point it just faded out because George  
11 never lived up to it. And then he began telling  
12 Bernie and the others, but I'm only going to speak for  
13 Bernie, about they were all going to participate and  
14 this is how they were going to get paid in the future.  
15 Again, not lived up to.

16 Q Okay. But at some point we know that this contract  
17 you say went into effect?

18 MR. QUICK: You're referencing Exhibit 1?

19 MR. ALLEN: I'm referencing Exhibit 1.

20 A We thought it did.

21 Q (Continuing by MR. ALLEN): I'm sorry?

22 A We thought it did. Bernie worked under the idea that  
23 this was a viable contract. We only found out later  
24 that it wasn't.

25 Q He worked as if that contract was in place, correct?

1 A He worked like he always worked. He co-produced, he  
2 arranged. He did everything.

3 Q What I'm trying to establish, ma'am, was there any  
4 other arrangement, written or otherwise, that was in  
5 place --

6 A No.

7 Q -- between the first oral contract you negotiated and  
8 the second?

9 A No.

10 Q Okay. So we just spent 10 minutes for me to get to  
11 the point where we are establishing that there was an  
12 oral contract that you negotiated at or around the  
13 time that your ex -- or your deceased husband left  
14 Maxine Brown until the contract that's Exhibit 1 was  
15 put in place, correct?

16 A Yes, yes.

17 Q Okay. So there's no other agreements other than that?

18 A Not that I remember.

19 Q All right. And at any point in time -- you said that  
20 you negotiated all of your deceased husband's  
21 contracts?

22 A No, I didn't say that because I didn't. I didn't do  
23 this one.

24 Q Okay. So you didn't negotiate that contract?

25 A No.

1 Q Okay.

2 A Lawyers did that.

3 Q Do you recall during your interview on the Truth in  
4 Rhythm podcast that you said -- I'm happy to show you  
5 the statement if you'd like it -- I negotiated  
6 Bernie's first contract with George which was the  
7 first of many that he went on to ignore?

8 A Yes, I --

9 MR. QUICK: That doesn't contradict what  
10 she just said.

11 MR. ALLEN: I'm asking whether she made the  
12 statement, Dan.

13 A Yes.

14 Q (Continuing by MR. ALLEN): Okay.

15 A I just made it to you --

16 Q All right.

17 A -- prior to all of this.

18 Q All right. Now you mentioned that there were many  
19 others that Mr. Clinton went on to ignore. What other  
20 contracts, other than the contract that's Exhibit 1,  
21 did Mr. Clinton go on to ignore?

22 A I don't remember but I'll put it to you this way. If  
23 there was a contract, George ignored it.

24 Q Okay. But sitting here today you have no other  
25 evidence of any other contract that you negotiated

1 with Mr. Clinton other than Exhibit 1, correct?

2 A Not that I remember.

3 MR. QUICK: Wait, she said she did not  
4 negotiate Exhibit 1, Jim.

5 MR. ALLEN: Okay.

6 MR. QUICK: You're mischaracterizing  
7 testimony.

8 THE WITNESS: Oh, this is Exhibit 1?

9 MR. QUICK: Yes.

10 THE WITNESS: I did not --

11 Q (Continuing by MR. ALLEN): Right. You're not --

12 A Three times I told I did not do this.

13 Q Okay. You're not aware of any other contract that was  
14 negotiated by you or anybody else other than Exhibit  
15 1, correct, sitting here today?

16 MR. QUICK: At any point in time?

17 MR. ALLEN: At any point in time.

18 A I'm not sure.

19 Q (Continuing by MR. ALLEN): Do you have any evidence  
20 with you today that there was any other contract other  
21 than Exhibit 1 and the oral contract that you  
22 referenced earlier in your testimony?

23 A No.

24 Q Okay. I'm going to ask you some questions about your  
25 impressions of your husband's reputation for

1 truthfulness, okay. Do you believe that your husband  
2 was a truthful man?

3 A Definitely, particularly with me.

4 Q Were you ever aware of an instance where your husband  
5 said something to somebody that was untrue?

6 A How would I know that?

7 Q Well, I'm asking --

8 A I'd have to be there.

9 Q I'm asking you what you know. Did you ever --

10 A No, I don't know that.

11 Q Okay. So you've never yourself witnessed your husband  
12 being untruthful to anybody is my question?

13 A It was not Bernie's way. I can't -- nothing comes to  
14 mind.

15 Q Okay. So you would describe him today as a truthful  
16 person?

17 A Yes.

18 Q Okay. And would you have allowed him -- strike that.

19 Were you involved in the drafting of a  
20 lawsuit advising your husband or discussing with  
21 lawyers that was filed in the Supreme Court of the  
22 State of New York in 1981?

23 A I have to see it.

24 Q Okay. Let's mark this as 2. It's the -- 2 is the  
25 Verified Complaint.

1 (WHEREUPON Exhibit No. 2  
2 was marked for identification  
3 by the reporter.)

4 THE WITNESS: Now could you ask me that  
5 question again?

6 MR. QUICK: He hasn't asked a question yet.

7 THE WITNESS: Oh.

8 MR. QUICK: Oh, yes, he did. He asked if  
9 you were involved in the lawsuit.

10 Q (Continuing by MR. ALLEN): Let me ask you a more  
11 basic question. Have you seen that document before?

12 A I don't know, I saw so many documents I can't isolate  
13 which one I saw and when I saw it. But there's  
14 something you need to know about Bernie.

15 Q Ma'am, this will go --

16 A I was answering your question but I'll wait.

17 Q This will go quicker if you answer the questions that  
18 I ask.

19 A I was about to answer a question you asked before.

20 Q Go ahead, go ahead.

21 A No, I'll wait for you.

22 Q You don't recall ever seeing this document before?

23 A I didn't say that. I said I can't recall every single  
24 document at this point in time.

25 Q We'll give you that it's been a long time, okay. If

1           you can confine your answers to the questions I'm  
2           asking, that would be -- that will get us out of here  
3           in the seven and a half hours that we have.

4       A     Good, just make your questions specific.

5       Q     All right. So I'm asking -- I think I asked, and I  
6           think I got an answer, that you don't -- is it that  
7           you don't recall seeing this document?

8       A     Is that the question?

9       Q     Yes.

10      A     I can't recall every document I ever saw pertaining to  
11           Bernie.

12      Q     We've given you that, okay?

13      A     All right.

14      Q     This document, however, can you recall -- because it  
15           was attached to your 2019 Complaint in the State of  
16           New York, or the State's Complaint in New York, as an  
17           exhibit. So I know 2019 was a long time ago, but you  
18           have no present recollection of seeing that particular  
19           document, Exhibit 2, prior to today, correct?

20      A     I didn't say that. I said I cannot recall every  
21           single document that I ever saw for Bernie, including  
22           this one.

23      Q     Okay. That's the important part of the answer. You  
24           haven't -- you don't recall seeing that document,  
25           okay. Will you take a minute --

1 A I didn't say I didn't recall seeing it, but I don't  
2 recall seeing every single document pertaining to  
3 Bernie, including this one.

4 Q Right.

5 A Now I may or may not have.

6 Q I think I have my answer, ma'am.

7 A There you go.

8 Q Can you take a quick look and review that document.

9 A Okay.

10 Q Okay. Do you have any reason to doubt, given the fact  
11 that you attached it as an exhibit to a Complaint in  
12 New York in 2019, the authenticity of this Verified  
13 Complaint that's Exhibit 2?

14 A Not to the best of my knowledge.

15 Q And is there anything about that document that you  
16 find to be improper?

17 MR. QUICK: Objection, form, foundation.

18 THE WITNESS: Should I answer that?

19 MR. QUICK: If you're able to.

20 THE WITNESS: I'm not.

21 Q (Continuing by MR. ALLEN): So you're not what, ma'am?

22 A When you see a document that is obviously a legal  
23 document, that would have been done by lawyers. Me  
24 and Bernie sitting there and they saying whatever  
25 they're saying, Bernie telling me whatever. And then



1 we would proceed from there. As for me acting in the  
2 capacity of a lawyer, I never did that.

3 Q That wasn't my question, ma'am.

4 A That's my answer.

5 Q All right. My question was do you have any reason to  
6 doubt the authenticity of this document?

7 A Not to the best of my knowledge.

8 Q All right. Specifically the stamp up at the top right  
9 hand corner it says page 11 of 11, it's the last page  
10 of the document. It purports to -- yes.

11 A That page, yeah.

12 Q It purports to bear the notarized signature of George  
13 Bernard Worrell.

14 A Right.

15 Q Does that appear to be your husband's signature?

16 A That's Bernie's signature.

17 Q And you understand -- you testified about your  
18 husband's reputation for truthfulness as it relates to  
19 you. You have no reason to believe that he signed  
20 this document in duress?

21 A No.

22 Q And he's certifying that the statements in this  
23 document are true, okay. Do you have any reason to  
24 believe that he would falsely certify that the  
25 statements in the --

1 A No.

2 Q -- document were true?

3 So he believed the document was -- or the  
4 statements in the document were true in 1981 when he  
5 signed it. Do you believe that they're true today?

6 MR. QUICK: Form and foundation.

7 A I have no way of knowing that.

8 Q (Continuing by MR. ALLEN): Okay. You don't have any  
9 evidence to suggest that there's anything in the  
10 document that your husband swore to was true was in  
11 any way false, do you?

12 A No.

13 Q Okay. Now I want to try to understand your claim a  
14 little bit better. And as I understand the evolution  
15 of how it got here was there was a ruling in 2019 from  
16 the New York court that invalidated the document or  
17 ruled that it was unenforceable, that's Exhibit 2.  
18 And that on the basis of non-existing --

19 MR. QUICK: Exhibit 1.

20 MR. ALLEN: I'm sorry, you're right, Dan,  
21 Exhibit 1.

22 Q (Continuing by MR. ALLEN): And on the basis of that  
23 conclusion that there was an absence of a written  
24 contract covering your husband's services, that that  
25 makes him a co-owner of the sound recordings in this

1 case, correct?

2 A I'm not sure what you're asking me.

3 Q Is it your position that the absence of a signed  
4 written contract provides you -- provides the estate  
5 with an interest in the sound recordings that your  
6 husband performed on?

7 A Well, as George says he never signed a contract, what  
8 other -- what else could we come to as a conclusion.

9 Q Okay. So that is your conclusion, correct?

10 A Uh-huh.

11 Q All right. And you would agree with me that if there  
12 is a signed contract that covers your husband's  
13 performances on those sound recordings, or an  
14 enforceable contract I should say, that that would  
15 have a material adverse impact on your theory of this  
16 case, correct?

17 MR. QUICK: Form, foundation, legal  
18 conclusion and facts not in evidence.

19 A What he said.

20 Q (Continuing by MR. ALLEN): Ma'am, I'm not here to  
21 give you instruction but your counsel can make  
22 objections. The rule in the Eastern District of  
23 Michigan is that the objections are noted, and that  
24 unless I'm asking you about a matter of privilege,  
25 that you have to answer through the objection.

1 MR. QUICK: But it doesn't mean that if you  
2 get a question that you don't understand or that  
3 you're not able to answer, that you have to somehow  
4 make something up.

5 THE WITNESS: Okay.

6 MR. ALLEN: Right.

7 MR. QUICK: So you just tell Mr. Allen if  
8 there's something about the question in order that you  
9 can't answer or that you don't understand.

10 MR. ALLEN: Sue, would you read my last  
11 question back for her, please.

12 (WHEREUPON the reporter read  
13 back the question as follows):

14 QUESTION: "And you would agree with me that if there  
15 is a signed contract that covers your  
16 husband's performances on those sound  
17 recordings, or an enforceable contract I  
18 should say, that that would have a material  
19 adverse impact on your theory of this case,  
20 correct?"

21 A No, not correct. I would not agree with you because I  
22 would have to see what other you're talking about in  
23 order to agree with you.

24 Q (Continuing by MR. ALLEN): Okay. Your case is, as  
25 you said, absence of contract means that Mr. Worrell

1 has an interest in sound recordings. That was your  
2 testimony, --

3 A Yes.

4 Q -- was it not?

5 Okay. So if that statement was not true --

6 A Which statement?

7 Q The statement that the absence of a --

8 A Oh.

9 Q -- contract -- the statement that if there was a  
10 contract, then that would have a impact on your case?

11 MR. QUICK: Asked and answered.

12 A I can't respond to a hypothetical.

13 Q (Continuing by MR. ALLEN): Okay. Well, actually we  
14 are entitled to ask you hypothetical questions.

15 A Okay.

16 Q If you don't feel that you understand my question, I'm  
17 more than happy to rephrase it.

18 A I understand it but I can't respond to it the way it's  
19 put. I mean you're asking me to compare something  
20 I've never set eyes on to something else. I can't do  
21 that.

22 Q No, I'm not asking you to do that, ma'am. My  
23 question, and I'd appreciate it if I could get a  
24 direct answer to it, is your case would be different  
25 if there was a signed contract in place, correct?

1 MR. QUICK: Form, foundation, legal  
2 conclusion. And her inability to answer your  
3 question, counsel, is an answer.

4 MR. ALLEN: Dan, you can give your  
5 objection without speaking and leading your witness,  
6 okay.

7 MR. QUICK: I'm not.

8 MR. ALLEN: I didn't do that to you  
9 yesterday. I didn't do that to you yesterday and I  
10 won't do that throughout the case, all right. So  
11 let's quit with that or we're going to be -- you're  
12 not going to filibuster me here so I don't get to my  
13 questions, okay, because I'll stop the deposition  
14 today and tomorrow and go to the judge.

15 MR. QUICK: Counsel, you can raise your  
16 voice and you can do whatever you want.

17 MR. ALLEN: I'm not raising my voice, Dan.

18 MR. QUICK: My comment --

19 MR. ALLEN: I'm not rising my voice, but  
20 you can interpose your objections without leading your  
21 witness. You know it. I've been around a lot longer  
22 than you have and I'm not going to sit here and allow  
23 you to lead your witness with your objections.

24 MR. QUICK: My objection is proper. Move  
25 on.

1 MR. ALLEN: Object to form and don't lead  
2 your witness, okay. It's improper. It's improper and  
3 you know it.

4 MR. QUICK: Then do something about it.

5 MR. ALLEN: I will if it continues, all  
6 right.

7 THE WITNESS: There's some questions I'm  
8 going to look to him for if I should answer or not,  
9 whether you like that or not. He's my attorney.

10 MR. ALLEN: That is your right. Ma'am,  
11 that is your right and not I'm here to argue with you.

12 THE WITNESS: You definitely are not.

13 MR. ALLEN: You can ask, you can ask your  
14 counsel for all the advice you like --

15 THE WITNESS: Thank you.

16 MR. ALLEN: -- so long as there's not a  
17 question pending on the table.

18 THE WITNESS: So the next time I want to  
19 ask you a question, I'm going to say to you can I ask  
20 you a question and that should relieve his anxiety  
21 over there, right?

22 MR. ALLEN: Ma'am, I have no anxiety.

23 THE WITNESS: I'm not asking you, I'm  
24 asking you him.

25 MR. QUICK: Let's start with a fresh

1 question.

2 THE WITNESS: Okay.

3 MR. ALLEN: I'd like my last question to be  
4 re-asked to the witness.

5 (WHEREUPON the reporter read  
6 back the question as follows):

7 QUESTION: "My question, and I'd appreciate it if I  
8 could get a direct answer to it, is your  
9 case would be different if there was a  
10 signed contract in place, correct?"

11 MR. QUICK: Same objection.

12 A I don't know.

13 Q (Continuing by MR. ALLEN): That's an appropriate  
14 answer, ma'am.

15 A I'm glad you approve.

16 Q So you made a statement that Mr. Clinton never paid  
17 your husband under the oral contract?

18 A I didn't say never.

19 Q Okay. So tell me in terms of the 200 -- \$200 a week  
20 you said?

21 A That's right.

22 Q All right. How many payments did Mr. Clinton miss, as  
23 you say, under the oral contract for \$200 a week?

24 A I don't know. Enough of them to cause concern to me  
25 and Bernie.



1 Q Okay. Was it more than 10?

2 A Maybe.

3 Q Okay. Do you have any evidence that Mr. Clinton,  
4 sitting here today other than your testimony, that  
5 your deceased husband was not paid as agreed?

6 A Do you have any proof that he was?

7 Q I do and we'll get to that.

8 A Okay, great. Well, I don't have that.

9 Q Okay. Well, your counsel does. Maybe he should have  
10 shared it with you before --

11 A We'll get to that.

12 Q -- your deposition.

13 So your answer is you have no evidence that  
14 your husband was not paid the \$200 a week?

15 A That is not what I said. I said I don't remember.  
16 Bernie was doing gigs, okay. And sometimes George  
17 would pay him and sometimes George wouldn't. We  
18 didn't keep track of that back then because we didn't  
19 realize what he was like.

20 Q Okay. And you have no recollection sitting here today  
21 how many times that occurred?

22 A No, I don't.

23 Q Okay. So could be one, it could be a hundred, you  
24 just don't remember?

25 A That's what I said.

1 Q Okay.

2 (WHEREUPON Exhibit No. 3  
3 was marked for identification  
4 by the reporter.)

5 Q (Continuing by MR. ALLEN): Ready?

6 A Yes.

7 Q Ma'am, have you seen the document marked as Exhibit 3  
8 previously?

9 A Maybe.

10 Q Okay. Is there anything that would refresh your  
11 recollection as to whether or not you've seen it?

12 A No, your -- no.

13 Q Okay. Turning to the third page of that exhibit,  
14 there is a signature block that purports to have  
15 Mr. Worrell's signature, I declare under penalty of  
16 perjury under the laws of the United States of America  
17 that the above is true and correct. Executed this 2nd  
18 day of October in Plainfield, New Jersey, 19 -- 2nd  
19 day of October 1993 in Plainfield, New Jersey, I  
20 apologize. It's a little blurry on my copy.

21 Did you live in Plainfield, New Jersey in  
22 1993 that you recall?

23 A Yes.

24 Q And is that your deceased husband's signature on the  
25 signature line there?

1 A Yes.

2 Q And so he's declaring under penalty of perjury that  
3 the statements in the Complaint are true. Do you have  
4 any reason to dispute that the statements that were  
5 made in that Complaint were true?

6 MR. QUICK: Statements or the declaration?

7 MR. ALLEN: Well, he's certifying, he's  
8 certifying in -- yes, that's correct, in the  
9 declaration, that the statements are true.

10 A Not based on his available knowledge at the time.

11 Q (Continuing by MR. ALLEN): I don't understand your  
12 answer, ma'am.

13 A Okay, repeat your question.

14 Q I said -- go ahead.

15 (WHEREUPON the reporter read  
16 back the question as follows):

17 QUESTION: "And so he's declaring under penalty of  
18 perjury that the statements in the  
19 Complaint are true. Do you have any reason  
20 to dispute that the statements that were  
21 made in that Complaint were true?"

22 A Not based on Bernie's available knowledge at the time.

23 Q (Continuing by MR. ALLEN): Okay. So you believe that  
24 he believed that the statements in that Complaint --  
25 or in that declaration, Exhibit 3, were true?

1 A Yes.

2 Q All right.

3 (WHEREUPON Exhibit No. 4

4 was marked for identification

5 by the reporter.)

6 Q (Continuing by MR. ALLEN): Have you seen that --

7 A Yes.

8 Q -- document before?

9 Can you tell us what it is?

10 A It's an audit.

11 Q And audit of what, ma'am?

12 A On the first page it tells you, Audit of Thang,

13 Incorporated and Malbiz Music.

14 Q Now there are, as you can see, a number of  
15 calculations that were made of royalties due to your  
16 husband according to Herzog and Straus. Do you see  
17 the calculations towards the end of the document?

18 A I've seen them.

19 Q And who's Herzog and Straus?

20 A Ira Herzog is a, I guess they call him a forensic  
21 accountant.

22 Q And I'm trying to understand where Mr. Herzog -- who  
23 engaged the services of Mr. Herzog?

24 A I did.

25 Q And what was the reason why you engaged the services

1 of Mr. Herzog?

2 A Because Bernie was very loyal to George and he would  
3 not believe that George was cheating him, so I had to  
4 find a way to prove it and that's what I did.

5 Q Okay. Did you consult with Mr. Worrell prior to, --

6 A Always.

7 Q -- prior to asking for the audit?

8 A Always.

9 Q So walk me through that discussion that you had with  
10 your deceased husband.

11 A I can't -- you want me to recount a conversation that  
12 happened over what, 40 years ago?

13 Q Ma'am, you filed the lawsuit covering the period so  
14 I'm asking the questions regarding the period of time  
15 that is covered in your lawsuit. So if you recall,  
16 you can answer my question. If you don't recall --

17 A I don't recall the specific conversation.

18 Q Okay. Then what do you recall generally about the  
19 conversation?

20 A Bernie, I had a audit done because George Clinton is  
21 not who you think he is.

22 Q Ma'am, it would be helpful -- what I think of my  
23 client is immaterial to the case.

24 A I'm not talking --

25 MR. QUICK: You asked her --

1 A You asked me what I said to Bernie.

2 MR. ALLEN: I don't need the  
3 editorialization about my client.

4 MR. QUICK: She's recounting the  
5 conversation that you directly asked her about.

6 THE WITNESS: Yes, I am.

7 MR. ALLEN: I wasn't in the conversation, I  
8 was 10 years old when the audit was -- I have nothing  
9 to do with the conversation.

10 THE WITNESS: I wasn't talking about you.

11 MR. ALLEN: So the characterization of  
12 Mr. Clinton not being the person who -- it's  
13 immaterial to this case what I think of my client.

14 THE WITNESS: Then don't ask me what I said  
15 to Bernie because that's what I said to Bernie.

16 MR. ALLEN: Well, I'm sure in 1980 when you  
17 had the conversation you didn't ask him or tell him  
18 anything about Jim Allen because Jim Allen was still  
19 collecting baseball cards.

20 THE WITNESS: When did you name come up in  
21 my conversation with Bernie years ago.

22 MR. ALLEN: You said --

23 MR. QUICK: Don't argue with the lawyer.

24 MR. ALLEN: You used the word you, what I  
25 think of Mr. Clinton. It has nothing to do with what

1 I think of Mr. Clinton.

2 MR. QUICK: I have no idea what you're  
3 talking about, counsel.

4 THE WITNESS: Neither do I.

5 MR. QUICK: She was trying recount to you  
6 the conversation.

7 MR. ALLEN: Read the -- Dan, your speaking  
8 objections --

9 THE WITNESS: That's what I was doing.

10 MR. ALLEN: -- are not welcome, okay. You  
11 are --

12 MR. QUICK: It's not a speaking objection.

13 MR. ALLEN: You are -- no, your role here,  
14 as I'm sure you've read the local rules, is to place  
15 your objection on the record, not to guide the  
16 witness's answers here. And that's exactly what  
17 you're doing. I didn't do it to you, it's not what I  
18 do because I follow the rules. I'd ask for the same  
19 respect and courtesy from you.

20 MR. QUICK: You're incorrect. Do you have  
21 a question?

22 (WHEREUPON the reporter read  
23 back as follows):

24 QUESTION: "Then what do you recall generally about  
25 the conversation?

1           ANSWER:     Bernie, I had a audit done because George  
2                       Clinton is not who you think he is."

3       Q     (Continuing by MR. ALLEN):   Okay.   What else?

4       A     What else what?

5       Q     What else did you say and what did he say in the  
6             conversation that you recall as a general matter?

7       A     Basically Bernie was against it.   He said George  
8             wouldn't do me like that.   I said he did it to the  
9             Parliament, he'll do it to you too.

10      Q     Okay.   What do you mean he did it to the Parliament?

11      A     That goes into the history.   You want to know about  
12             that?

13      Q     I'd like to know what that statement means.

14      A     What that statement meant was we -- there was an  
15             agreement that everybody was going to share in Thang,  
16             Incorporated.   George continuously pushed Parliament  
17             away to the point where they weren't even coming into  
18             the studio anymore.

19                       And so I was explaining to Bernie that that  
20             schism or whatever that George did to Parliament, he  
21             would do, and was in the process of doing, to Bernie.

22      Q     Okay.   So who provided the information to Herzog and  
23             Straus for the audit?

24      A     I don't know.   I hired Ira and Ira did what Ira did.

25      Q     Okay.   And --



- 1 A That's why I wanted a professional.
- 2 Q Okay. So Ira being the person who did the audit?
- 3 A Ira Herzog, Herzog and Straus.
- 4 Q Right.
- 5 A He did the audit and he was a principal in his
- 6 company.
- 7 Q Who else assisted you in providing Mr. Herzog with the
- 8 information in the audit?
- 9 A I don't remember. I don't think anybody. That's what
- 10 he did.
- 11 Q Okay. So you didn't give Mr. Herzog any information?
- 12 A I had none to give him. I was looking for him to give
- 13 me information.
- 14 Q Okay. So walk me through the conversation you had
- 15 with Mr. Herzog when you asked him to do the audit, to
- 16 the best of your ability. What did you ask him to do?
- 17 A I need you to do an audit because I need to prove to
- 18 my husband what's going on because he won't believe
- 19 me.
- 20 Q Okay. And did Mr. Herzog ask you for any information
- 21 about what was the basis of your --
- 22 A No.
- 23 Q -- suspicions?
- 24 A Uh-uh.
- 25 Q No. So you had no role in what Mr. Herzog put

1 together in the audit?

2 A No, absolutely not.

3 Q All right. You gave him no information?

4 A I think I just said I didn't have any information to  
5 give him.

6 Q Okay. So you had no information to give him and you  
7 don't know what information he based his audit on?

8 A I hire a professional to do something. I expect them  
9 to do what I hire them to do. I don't come behind hem  
10 and micromanage.

11 Q Okay, ma'am, but typically when somebody does an  
12 audit, they audit on the basis of information. It's  
13 not --

14 A I have no knowledge --

15 Q -- just a guess.

16 A -- of what people typically do.

17 Q Okay. So for all you know he could have pulled it out  
18 of a cereal box, the information; you don't know where  
19 he got the information from that's in this audit?

20 MR. QUICK: Facts not in evidence.

21 Q (Continuing by MR. ALLEN): Was that not your  
22 testimony, ma'am?

23 MR. QUICK: Objection to form.

24 Q (Continuing by MR. ALLEN): Was that not your  
25 testimony?

1 MR. QUICK: It mischaracterizes her  
2 testimony.

3 Q (Continuing by MR. ALLEN): I'm asking was that not  
4 your testimony?

5 A Was what not my testimony?

6 Q You don't know what information he used in order to  
7 come up with the audit?

8 A I don't know where he obtained his information. It  
9 was not of importance to me. The fact that he was a  
10 professional in doing his job is what was important to  
11 me.

12 Q Okay. But he could have gotten the information from a  
13 garbage can, you don't know?

14 A He could have pulled it out of the sky, yeah, if you  
15 want to go that route.

16 Q So sitting here today you can't tell us what the basis  
17 of his conclusions were?

18 A They are in the document.

19 Q I'm talking about the underlying basis for the  
20 conclusions that are in the document.

21 A Such as what?

22 Q Well, you didn't give him any documents?

23 A That I remember.

24 Q Okay. You didn't tell him what to do?

25 A Definitely not.

1 Q And you didn't give him any other information --

2 A No.

3 Q -- you just testified to?

4 A I couldn't, no.

5 Q Are there any other people that you're aware of who  
6 would have given Mr. Herzog information about this  
7 audit that you can remember today?

8 A No.

9 Q Okay. Is it because there weren't other people  
10 involved in giving him information or you just don't  
11 remember who?

12 A I don't remember.

13 Q Okay. Now it's addressed to Mr. Bernie Worrell, the  
14 audit, correct?

15 A Yes.

16 Q All right. And there's a statement in the second  
17 paragraph that says we were informed by you that a  
18 royalty of three quarters of one percent is due you  
19 with reference to the artist royalties of Parliament.  
20 Thang, Inc.'s representatives had orally confirmed  
21 that factor during the course of our review, okay.

22 So you gave him the information that there  
23 was three quarters of one percent due with reference  
24 to the artist royalties. Was it you or your husband  
25 that gave him that information, because it says we

1           were informed by you?

2       A     I don't know. It could well -- I don't know.

3       Q     And there's a reference to Thang, Inc.'s  
4           representatives. Do you know who those  
5           representatives were?

6       A     No. They changed constantly.

7       Q     Do you know whether that's a true statement in the --

8       A     No, I don't know that either.

9       Q     Okay.

10                               (WHEREUPON Exhibit No. 5  
11                               was marked for identification  
12                               by the reporter.)

13                       THE WITNESS: I'm going to need to take a  
14           break in the next five minutes to go to the bathroom.

15                       MR. ALLEN: Okay, let's get you to identify  
16           this.

17       Q     (Continuing by MR. ALLEN): I want to direct your  
18           attention to the page that looks like this. It says  
19           verification at the top.

20       A     Okay.

21       Q     Have you seen that document, the verification page?

22       A     I don't remember.

23       Q     All right. I want you to look down about a quarter of  
24           the way, you'll see that it was -- claims to be  
25           executed on April 20, 1984, Plainfield, New Jersey.

1 Again we've established that you lived in Plainfield,  
2 New Jersey at that time, correct?

3 A Yes.

4 Q And there's a signature that purports to be G. Bernard  
5 Worrell, Junior. Does that appear to be your  
6 husband's signature?

7 A Yes.

8 Q So you believe that to be an authentic signature of  
9 your husband?

10 A Yes.

11 Q And in that verification it says -- there's a box  
12 checked, first box, I am a party to this action. The  
13 matters stated in it are true of my own knowledge,  
14 except as to those matters which are stated on  
15 information and belief, and as to those matters I  
16 believe them to be true.

17 Do you understand what that means?

18 A Yes.

19 Q Okay. So your husband is attesting to what he  
20 believes to be the truth of the allegations in the  
21 Complaint that was filed Worrell versus Tercer Mundo,  
22 et al in the Superior Court for the State of  
23 California, County of Los Angeles, correct?

24 A Yes.

25 Q Okay. So is it your belief, as we sit here today,

1           that your husband believed the statements in Exhibit 5  
2           are true?

3       A     Yes.

4       Q     Do you believe those statements are true?

5       A     To the best of my knowledge.

6                       Okay, I got to go.

7               MR. ALLEN: Go. Off the record at 9:57.

8                       (WHEREUPON a short pause was  
9                       had in the proceedings 9:57  
10                      a.m. to 10:05 a.m.)

11              MR. ALLEN: Back on at 10:05.

12                      (WHEREUPON Exhibit No. 6  
13                      was marked for identification  
14                      by the reporter.)

15       Q     (Continuing by MR. ALLEN): Ma'am, I've handed you  
16           what's been marked as Exhibit 6, and I just ask you to  
17           take a quick look at that for me. Let me know when  
18           you're finished.

19       A     Excuse me?

20       Q     Let me know when you're finished.

21       A     You want me to read 72 pages right now?

22       Q     I need you to read it to familiarize yourself with it,  
23           ma'am, but you can take as much time as you'd like  
24           with it.

25       A     Okay.

1 Q Just let me know when you're finished reviewing it.

2 A Okay.

3 Q So do you recognize this document?

4 A No.

5 Q Okay. This purports to be a Complaint that was filed  
6 in 2019 in the State of New York. It's the same  
7 parties that are in this case here except there's no  
8 -- the same parties that are now in the case are in  
9 this caption. The estate of George Bernard Worrell,  
10 Junior versus Thang, Inc. and George Clinton.

11 Now in 2019 who was the -- I'm not sure  
12 what the terminology is in Washington, but here it's  
13 the personal representative of the estate. Who's  
14 appointed personal representative?

15 A Of Bernie's estate?

16 Q Uh-huh.

17 A Me.

18 Q So this Complaint had to be authorized by you prior to  
19 it being filed?

20 A Yes.

21 Q And you would have reviewed the Complaint for accuracy  
22 prior to it being filed?

23 A To the best of my ability.

24 Q If there was any material misstatement that was  
25 contained in a draft of the Complaint prior to it



1           being filed, you would have corrected it, correct?

2       A     To the best of my ability.

3       Q     The second allegation in the Complaint is on or about  
4           January 1, 1976, while in the State of New York,  
5           Mr. Worrell signed a recording contract, hereinafter  
6           the agreement, with Clinton. The parties to the  
7           agreement, which was drafted by Clinton's New York  
8           counsel, is by and between Worrell and a company  
9           called Thang, Inc. Defendant Thang was registered as  
10          a New York corporation in 1982.

11                   On information and belief Clinton entered  
12          into numerous agreements prior to 1982 on behalf of  
13          defendant Thang. On information and belief, at all  
14          times relevant to the claims asserted herein, Clinton  
15          is and has been the sole owner of Thang.

16                   Do you see that?

17       A     I see that.

18       Q     Okay. Do you agree with that statement?

19       A     To the best of my ability.

20       Q     Okay. So again you're agreeing that there was a  
21          contract that was in place on January 1, 1976 between  
22          Mr. Worrell and Thang, correct?

23       A     To the best of my knowledge, yes.

24       Q     Okay. And it's still your belief that there was a  
25          contract that was signed on January 1, 1976 between

1 your deceased husband and Thang, Inc., correct?

2 A I'm sorry, say that again.

3 (WHEREUPON the reporter read  
4 back the question as follows):

5 QUESTION: "And it's still your belief that there was  
6 a contract that was signed on January 1,  
7 1976 between your deceased husband and  
8 Thang, Inc., correct?"

9 A Are you asking me do I believe that now or did I  
10 believe that then?

11 Q (Continuing by MR. ALLEN): Well, let's start with  
12 then.

13 A Yes.

14 Q Okay. Now there was a subsequent ruling by a New York  
15 State judge that said that the contract was  
16 unenforceable, correct?

17 A Not really. That's not what I was given to believe.

18 Q Okay. Well, tell us what your belief is today.

19 A I was given to believe that George Clinton stated that  
20 he never signed the contract and, therefore, the judge  
21 under the dead man's statute couldn't proceed with it.

22 Q Okay. Now are you referring to a declaration that  
23 Mr. Clinton made in that case?

24 A No.

25 Q Okay. What is it that you're referring to?

1 A The court case itself when it was found that Clinton  
2 alleged he had never signed it.

3 Q Okay. But I believe it's attached to your current  
4 Complaint. I apologize, I don't have additional  
5 copies of it but, yeah, here it is. I don't need a  
6 copy of it.

7 Dan, can you be kind enough to show your  
8 client. I'm sure I have it in here somewhere.

9 (WHEREUPON Exhibit No. 7  
10 was marked for identification  
11 by the reporter.)

12 MR. QUICK: I'm sorry, if there was a  
13 question, I missed it.

14 Q (Continuing by MR. ALLEN): Okay. Have you seen that  
15 document before, ma'am?

16 A No.

17 Q Okay. Is that the basis of your conclusion that  
18 Mr. Clinton said he didn't sign the Complaint?

19 A No.

20 Q Okay. What is the basis for your conclusion that  
21 Mr. Clinton stated that he did not sign the  
22 Complaint -- or sign the January 1, 1976 contract?

23 A That's what my attorney at the time told me.

24 Q Okay. And did your attorney tell you that he based  
25 his decision -- strike that.

1                   Is it your belief that your attorney based  
2                   his conclusion on that document?

3                   MR. QUICK: Objection, foundation. Plus  
4                   obviously I don't want to get into a waiver of a  
5                   privileged situation.

6                   MR. ALLEN: I'm just asking whether she  
7                   believes that today. I'm not asking on the basis of  
8                   any communication.

9       Q       (Continuing by MR. ALLEN): Do you believe that your  
10              attorney's conclusion which he conveyed to you, that  
11              Mr. Clinton did not sign the Complaint -- or did not  
12              sign the January 1, 1976 agreement, emanates from that  
13              document which is Exhibit Number 7?

14              MR. QUICK: Foundation.

15       A       I think I answered it when I said that the attorney,  
16              when I asked what was going on with the case, told me  
17              what the judge had decided; based on the fact that  
18              George alleged that he did not sign the contract and  
19              that Bernie was deceased. And under the dead man's  
20              statute, therefore, could not testify on his behalf.  
21              And that's when I knew irrespective of all of this.

22       Q       (Continuing by MR. ALLEN): So let me ask the question  
23              this way. You don't have any evidence for this case  
24              that your attorney concluded that Mr. Clinton did not  
25              sign the document, the contract, January 1, 1976,

1 other than what's in that document; you possess no  
2 other information about where he got his information?

3 A To the best of my knowledge, no.

4 Q Okay. Now I would like you to read the document and  
5 tell me where Mr. Clinton said that there was no  
6 contract between your husband and Thang.

7 A Which one, this one or this one?

8 Q Exhibit Number 7.

9 A Which is seven?

10 MR. QUICK: This. I'll object to form as  
11 she said she hasn't seen it before but...

12 MR. ALLEN: I'm asking her to read it now.

13 A Okay, I read it.

14 Q (Continuing by MR. ALLEN): Okay. What in that  
15 document do you read that says that Mr. Clinton said  
16 there was no contract between you and Mr. Worrell --  
17 or between Mr. Worrell or Mr. Clinton or Thang?

18 A Number four.

19 Q Okay.

20 A I did not sign the original or a copy of the document  
21 either on behalf of Thang, Incorporated or for myself.

22 Q Is that your conclusion?

23 A That is what's written right here.

24 Q Okay. But you conclude from that that Mr. Clinton was  
25 repudiating the contract between your husband and

1 Thang, correct?

2 A Is that a question?

3 Q Yes, that is a question.

4 MR. QUICK: Objection, form, foundation.

5 Q (Continuing by MR. ALLEN): I'm just asking you.

6 A No.

7 Q Then what other information do you have, other than  
8 what's in Exhibit 7, what evidence do you have other  
9 than what's in Exhibit 7 that Mr. Clinton repudiated  
10 the January 1, 1976 contract?

11 MR. QUICK: Same objection.

12 A It's what I said before. When you have all these  
13 papers like this and you've hired an attorney, they're  
14 not going to stand there and make you read 78 pages.  
15 They're going to synopsise. That's what was done.  
16 The basic result duty is bladda, bladda, bladda.

17 Q (Continuing by MR. ALLEN): Okay. So do you have any  
18 other evidence that Mr. Clinton repudiated the 1976  
19 contract between your husband and Thang other than  
20 what's in Exhibit 7?

21 A Not to the best of my knowledge.

22 MR. QUICK: Same objection.

23 Q (Continuing by MR. ALLEN): Thank you, thank you.  
24 These aren't trick questions. I'm trying to get  
25 through the facts and understand what your

1 understanding is, ma'am. I'm not trying to trick you.

2 Are you familiar with a gentleman by the  
3 name of Armen Boladian?

4 A Yes.

5 Q Okay. Who is Armen Boladian?

6 A Armen Boladian was head of Westbound Records and  
7 Bridgeport Music.

8 Q And when was the last time you had any form of contact  
9 with Mr. Boladian?

10 A Well, not with him. Years ago but not directly with  
11 him.

12 Q Okay. Then what indirect communications have you had  
13 with Mr. Boladian?

14 A None.

15 Q So you had no communication with Boladian, to the best  
16 of your knowledge, ever?

17 A Well, yeah, when I first met him.

18 Q When did you first meet him?

19 A When Bernie first joined P-Funk and he went around and  
20 Armen came over.

21 Q Came over where?

22 A Wherever Bernie was.

23 Q Okay. And when was the next time you remember  
24 Mr. Boladian?

25 A Same thing.

1 Q Since your husband has passed away have you had any  
2 form of communication from Mr. Boladian or his  
3 representatives?

4 A I don't know representatives but I have not had with  
5 Armen.

6 Q Okay. So do you recall approximately when the last  
7 time you spoke with Mr. Boladian?

8 A No.

9 Q Okay. Are you aware of Mr. Boladian having any  
10 communication with any of your representatives?

11 A No.

12 Q Okay. Have you had any communications with anybody  
13 from Westbound Records?

14 A I don't think so.

15 Q Okay. I notice that you receive some royalties from  
16 Bridgeport Music; is that correct?

17 A Yes.

18 Q Okay. And Bridgeport Music is owned by whom?

19 A Armen.

20 Q Okay. And do those payments just show up whenever  
21 they show up, or does somebody call you or provide you  
22 with information that the royalties are coming?

23 A Usually I'm calling them because I'm desperate for  
24 money; when's the royalties coming.

25 Q Okay. So who do you call at Westbound Records when



1           you're --

2       A     Sarah.

3       Q     Who's that?

4       A     Sarah.

5       Q     And who's Sarah?

6       A     Well, back -- you mean when, when -- who do I call  
7           when, now or years ago or what?

8       Q     I'm going to confine my questioning to the period of  
9           time from 2016, June of 2016 when your husband passed,  
10          to the present.

11      A     Okay, Sarah, Sarah. You want to know who I speak to?

12      Q     Yes.

13      A     Sarah.

14      Q     Sarah, is that S-A-R-A-H or --

15      A     Yes.

16      Q     Okay. And what's Sarah's last name?

17      A     Catlett, C-A-T-L-E-T-T.

18      Q     And who is she?

19      A     I don't know what her title is but she's who I call  
20          when I'm trying to get some money, get an advance from  
21          Armen, whatever.

22      Q     Okay. And is she with Bridgeport or is she --

23      A     I'm not sure.

24      Q     Okay. How do you know to call Sarah?

25      A     Because I used to call Helen and then all of a sudden

1 Helen wasn't there anymore and Sarah picked up the  
2 phone, so I started talking to Sarah.

3 Q Okay. And approximately how long has Sarah been in  
4 the picture?

5 A I have no idea.

6 Q Did you deal with Helen after your husband passed  
7 away?

8 A No.

9 Q Okay. So it's been Sarah since your husband passed  
10 away that you communicate with?

11 A Yes.

12 Q Okay. Walk me through a typical conversation that you  
13 have with Tara -- or Sarah, I'm sorry.

14 A I have to like -- typical conversation. Sarah, can  
15 you give me an idea, can you give me an idea when the  
16 checks are going out. Hey, Sarah, can you contact  
17 Armen, I need an advance. Those would be the two  
18 conversations we would have.

19 Q Okay. And has Mr. Boladian ever responded to any of  
20 those requests for advances?

21 A To me?

22 Q Yeah.

23 A Outside of advancing the money?

24 Q Uh-huh.

25 A No.

1 Q Did he advance you any money for this litigation?

2 A No.

3 Q Is he providing any support in this litigation for  
4 you?

5 A No.

6 Q At all?

7 A No.

8 Q Have you discussed this litigation with anybody from  
9 Bridgeport?

10 A Not to my knowledge.

11 Q Okay. Who have you discussed this litigation with  
12 other than your attorney?

13 A Various people. It has been -- various people.

14 Q Okay. Are any of those people connected to  
15 Mr. Boladian?

16 A I don't -- maybe.

17 Q Okay. Who might be connected to Mr. Boladian that you  
18 discussed litigation with?

19 A I'm not sure. Your question would have to be more  
20 specific.

21 Q What individuals do you speak with that are connected  
22 with Mr. Boladian on any sort of basis?

23 A I'm not sure.

24 Q Well, you testified just a minute ago that you may  
25 have spoken with representatives of Mr. Boladian at

1           some point in time. You don't know who those people  
2           are?

3       A     No.

4       Q     Do they show up --

5       A     It's been many, many years.

6       Q     Do they show up in a black car with no name  
7           identification and just say I'm from Bridgeport and --

8       A     No, they flew in on the Batmobile.

9       Q     Okay. So on these occasions when the Bridgeport  
10           personnel have flown into Washington on the Batmobile,  
11           Washington State or New Jersey?

12      A     Nobody flew to Washington.

13      Q     Okay. Well, you just testified that there were  
14           representatives from Bridgeport that have flown in to  
15           see you on a Batmobile so I'm --

16                   MR. QUICK: Counsel.

17      Q     (Continuing by MR. ALLEN): -- wondering when that  
18           took place.

19      A     No, you --

20                   MR. QUICK: You don't have respond to that.

21                   MR. ALLEN: Well, I --

22                   MR. QUICK: Counsel, she was responding to  
23           your smart aleck remark with her own smart aleck  
24           remark.

25                   THE WITNESS: That's right.

1 MR. ALLEN: I didn't think my remark was  
2 smart aleck at all.

3 THE WITNESS: I did.

4 Q (Continuing by MR. ALLEN): I'm asking you how and you  
5 weren't able to give me any ideas. And I was trying  
6 to refresh your recollection by giving you  
7 possibilities because you don't remember the names of  
8 the people. So I'm curious as to what it would be  
9 that I could refresh your recollection to help you  
10 remember who those representatives of Bridgeport or  
11 Westbound were.

12 MR. QUICK: Objection as to form,  
13 mischaracterizes the testimony.

14 Q (Continuing by MR. ALLEN): There's a question on the  
15 table, ma'am.

16 A I don't know what you could say to help my  
17 recollection.

18 Q What other form of communications have you had with  
19 representatives of Bridgeport Music other than to  
20 request your payments?

21 A I don't recall.

22 Q Have you ever discussed Mr. Clinton?

23 A With who?

24 Q With representatives of, let's start with Bridgeport.

25 MR. QUICK: Since Mr. Worrell passed away.

1 A I'm forever ranting over what George did to Bernie to  
2 anybody who will listen.

3 Q (Continuing by MR. ALLEN): You're not very happy with  
4 Mr. Clinton, are you?

5 A If somebody had taken 50 years of your spouse's  
6 whatever, how happy would you be?

7 Q Well, I don't know that that's happened, ma'am, so --

8 A I do.

9 Q -- I would just ask you to try to confine your answers  
10 to the questions I'm asking.

11 A I did. You asked me the question, I answered you.

12 Q Have you had any conversations with Joel Martin?

13 A Yes.

14 Q Okay. Who's Mr. Martin?

15 A I don't know what his title is.

16 Q And who does he work for?

17 A I'm not sure.

18 Q How is he related to Mr. Boladian?

19 A I don't know.

20 Q Is he a lawyer?

21 A I don't think so.

22 Q Is he a business manager?

23 A I don't know.

24 Q Okay. Tell me what your conversations with Mr. Martin  
25 have entailed.

1       A       I was calling Sarah and this guy answered the phone  
2               and identified himself and asked could he help. But  
3               Sarah wasn't in or she was at lunch or whatever, and I  
4               told him that I needed to ask for an advance against  
5               royalties. And he's like, well, I can arrange that  
6               for you. And so that's what we did.

7       Q       Okay. And how much was that advance?

8       A       Oh, I don't know. It varies. I try not to get too  
9               much because then when the money came, we would be at  
10              a deficit all over again.

11      Q       So when did you call Mr. Martin?

12      A       I don't know. I didn't call him, I called Sarah.

13      Q       Okay. When did that phone conversation happen?

14      A       After Bernie died.

15      Q       In 2016?

16      A       Yes.

17      Q       What happened during the conversation?

18      A       He said he would get back to me or Sarah would.

19      Q       Okay. And did Mr. Martin get back to you?

20      A       Sarah did.

21      Q       And what did Sarah say?

22      A       We sent the wire transfer.

23      Q       And how much was the wire transfer?

24      A       I don't remember.

25      Q       Was it more than a hundred thousand dollars?

1 A Oh, hell, no. No.

2 Q Was it more than \$50,000?

3 A No.

4 Q Was it more than \$20,000?

5 A No.

6 Q Was it more than \$10,000?

7 A No.

8 Q Was it more than \$5,000?

9 A Yes.

10 Q Okay. And did you have to sign any form of paper in  
11 order to get that advance?

12 A I don't think so because it was an e-mail.

13 Q Okay. Has that e-mail been produced in this case?

14 A I wouldn't have it.

15 Q Who would have the e-mail?

16 A I have no idea.

17 Q What happened to the e-mail?

18 A Once I get the money I don't care.

19 Q So you are in the habit of getting -- when you get  
20 money from something, you get rid of receipts or just  
21 e-mails?

22 A Can you be more specific, you mean in general or do  
23 you mean with this?

24 Q In general, yeah.

25 A It depends.



1 Q Okay. What does it depend on?

2 A Okay, let's suppose that somebody sent me \$1500, it  
3 was somebody I knew. I wouldn't be keeping receipts  
4 for that.

5 Q Okay. What if later on there's a question about what  
6 it is that you did receive; it's an advance, right?

7 A From my friend?

8 Q No, no, I'm talking about you got -- you received an  
9 advance.

10 A Are we talking the \$1500 that I just hypothetically  
11 brought up or before?

12 Q No, we're talking about the advance that you received  
13 from, was it Bridgeport or Westbound?

14 A Wire transfer, I think that was Bridgeport.

15 Q How long did you keep the e-mail from Bridgeport  
16 memorializing --

17 A I don't.

18 Q So once you got the money you deleted the e-mail?

19 A Not necessarily. It went off into wherever e-mails  
20 go. I have moved so much due to all this craziness, I  
21 don't know where a lot of stuff is. And I wouldn't  
22 keep something that wasn't that critical to me.

23 Q Right. So I notice in your discovery responses that  
24 you lost a number of documents at some point due to a  
25 storm?

1 A Is that a question?

2 Q Yeah.

3 A I didn't lose them, they were destroyed.

4 Q Okay. Tell us about that.

5 A We had rented a house in Everson, Washington, Bernie  
6 was dying. We had -- I had driven across country in  
7 an RV. The night that we -- or the night -- two  
8 nights after we moved in a huge tree fell on the front  
9 of the RV where all the documents were and all clothes  
10 and a bunch of other stuff was. The storm was  
11 tremendous, it ruined everything.

12 Q So in terms of the papers that you lost, when you say  
13 it ruined the papers, were they wet, were they ripped?

14 A Huge storm, wet.

15 Q Okay. Did you make any effort to recover those  
16 documents?

17 A Of course not.

18 Q Okay. So --

19 A That was impossible.

20 Q A tree fell on the front of the RV you said and that's  
21 where the documents were kept, right?

22 A They weren't kept there all the time. When we got to  
23 the house and we started moving in, we were moving  
24 stuff from the back to the front to make it easier to  
25 access because Bernie couldn't help, he was dying --

1 Q Okay.

2 A -- and I couldn't lift too much stuff. So I had to  
3 get stuff as close to the front as I could to drop it  
4 down onto a pulley thing. That's why they were where  
5 they were.

6 Q Okay. And so were they scattered, were they scattered  
7 or were they just wet?

8 A They were soaked.

9 Q Okay.

10 A The cardboard boxes had fallen open. There was water  
11 inside of them dripping on down to the floor.

12 Q Did you make any effort to try to recover them?

13 A And how would I do that?

14 Q Well, I mean there are companies that, disaster  
15 recovery --

16 A No.

17 Q -- companies that --

18 A Yeah, that requires money and again we didn't have  
19 any.

20 Q Okay. Did you seek to put those documents anywhere  
21 where they could be safely kept until you did have the  
22 money to have them restored?

23 A Again, they were soaked.

24 Q Okay. Well, being from Michigan we're all familiar  
25 with flooded basements, and I've had them myself. And

1 documents that do get wet do dry out and --

2 A These wouldn't. They were shredded -- not shredded,  
3 disintegrated.

4 Q All right. What kind of documents were there?

5 A Oh, God, all business related documents, bank  
6 statements.

7 Q Do you recall the contents of those documents?

8 A No.

9 Q So bank statements, what else?

10 A Business documents.

11 Q Tax returns?

12 A Some.

13 Q But you haven't had any problems with your tax returns  
14 being destroyed in these storms since 2016, have you?

15 A No.

16 Q Okay. I noticed that you've produced five out of the  
17 last 10 years of your royalty schedules in your income  
18 tax forms. Where are the other schedules?

19 A I don't know.

20 Q How do you keep your tax records, ma'am?

21 A Now?

22 Q Uh-huh.

23 A In a file.

24 Q And is the file for 2023 missing or --

25 A I don't know.

1 Q Have you filed taxes for the estate in 2023?

2 A Well, wait a minute, this is 2024. Not yet, I'll be  
3 filing them.

4 Q So you're on an extension right now?

5 A Wait a minute, wait a minute. I guess.

6 Q Okay. But you do have a royalty statement for 2023,  
7 correct?

8 A A royalty statement from who?

9 Q Well, ma'am, you have a consistent -- you've  
10 consistently shown that you're receiving various  
11 royalties, your attorney's produced five out of 10  
12 years. I'm wondering whether you received --

13 A Oh, you want to know if I received -- I'm sorry, I'm,  
14 I'm asking a question. Go ahead and say it again.

15 Q Yes. What royalties did you receive in 2023?

16 A I don't remember all of them.

17 Q Do you have an approximate amount?

18 A No.

19 Q Did you receive any royalties from Mom's Maybelline?

20 A No.

21 Q Okay. How about any royalties for work your husband  
22 did with Bill Elliott?

23 A No.

24 Q All right. No royalties for any work your husband did  
25 with Dionne Warwick?

1 A That was back when Bernie was in college.

2 Q Okay. I'm just asking, ma'am. Did you receive any  
3 royalties --

4 A No.

5 Q -- from his work with --

6 A No.

7 Q -- Dionne Warwick?

8 A No.

9 MR. QUICK: Your questions are all about  
10 2023?

11 MR. ALLEN: Yeah.

12 MR. QUICK: Yeah.

13 Q (Continuing by MR. ALLEN): Have you ever received any  
14 royalties from Mom's Maybelline?

15 A I don't know.

16 Q Okay. Have you ever received any royalties -- have  
17 you, your husband or the estate received any royalties  
18 from Dionne Warwick?

19 A No.

20 Q Have you or your husband or the estate ever received  
21 royalties from Chubby and the Turnpikes?

22 A No.

23 Q Okay. How about any royalties you, your husband, the  
24 estate from The Tavares?

25 A No.

1 Q And you already testified I think that no royalties to  
2 you, your husband or the estate from Maxine Brown?

3 A No.

4 Q Your husband was a member of the group called The  
5 Pretenders for a while, toured with them I think,  
6 right?

7 A Yes, he toured with them.

8 Q Did he ever -- did you, the estate or your husband  
9 ever receive any royalties for his work on -- work for  
10 The Pretenders?

11 A No.

12 Q I have to ask this because it's one of my favorite  
13 groups.

14 (WHEREUPON Exhibit No. 8  
15 was marked for identification  
16 by the reporter.)

17 Q (Continuing by MR. ALLEN): Go ahead and take a look  
18 at that document.

19 A I looked at it.

20 Q Okay. That's a document that purports to set forth  
21 the credited artists for a song called Burning Down  
22 The House. Are you familiar with that song?

23 A Yes, yes.

24 Q It was a pretty popular song back in the 1980's,  
25 wasn't it?

1 A Yes.

2 Q And I'm no musicologist but the song isn't the song  
3 without Bernie playing on the synthesizer on that  
4 song, correct?

5 A His arrangement, yes.

6 Q In your opinion is it a hit without Bernie's  
7 contribution?

8 A I have no way of knowing.

9 Q Okay. Your opinion?

10 A I don't have an opinion on that.

11 Q Are you proud of the work that Bernie did for Talking  
12 Heads?

13 A I'm proud of everything Bernie did.

14 Q But he's not credited at all on that album, is he?

15 A First of all, I think Burning Down The House was  
16 written by somebody else and so he wouldn't be  
17 credited for that.

18 Q Okay. He's not getting any sound recordings for that,  
19 is he?

20 A No, I don't know.

21 Q Or sound recording royalties?

22 A I don't know, I'm not sure.

23 Q The estate's not getting any sound royalties from  
24 that?

25 A I don't know.



1 Q How do you feel about Tina Weymouth and David Byrne  
2 not providing appropriate credit for Bernie basically  
3 putting them on the map?

4 MR. QUICK: Object to form and foundation.

5 A I don't have an opinion about that, I don't care.

6 Q (Continuing by MR. ALLEN): Are you bitter about the  
7 fact that they frequently have spoken about how they  
8 created the song with -- amongst themselves?

9 A I don't know that.

10 Q Well, do you feel like Bernie was given appropriate  
11 credit from that group?

12 A Oh, yeah.

13 Q What credit did they give Bernie for that, financial?

14 A Can I ask my attorney something?

15 Q Huh?

16 A Can I ask you something?

17 Q I prefer that you not do it during the pendency of a  
18 question unless it involves an issue of privilege. Is  
19 this something that has to do with something you've  
20 discussed with an attorney?

21 A Okay, never mind, just ask your question again.

22 (WHEREUPON the reporter read  
23 back the question as follows):

24 QUESTION: "What credit did they give Bernie for that,  
25 financial?"

1 A Financial credit for the album, is that what you're  
2 asking me?

3 Q (Continuing by MR. ALLEN): Yeah.

4 A I don't know, we were divorced. I divorced him then  
5 during that period.

6 Q Okay. Are you aware of any credit that he's -- that  
7 the estate is getting for that track?

8 A I don't know.

9 Q So walk me through how you account for the royalties  
10 that the estate is currently receiving. What happens,  
11 do you get a check in the mail, an EFT?

12 A Royalties from who?

13 Q Royalties from any source, how do you do the  
14 accounting on that, does it go to a third party who  
15 keeps track?

16 A Any royalties that are received are either coming in  
17 via wire transfer or a check, very seldom a check.  
18 And then the 1099s go to the accountant and that's how  
19 they're accounted for. I'm trying -- that's how  
20 they're accounted for.

21 Q Okay. So between the time -- I mean do the checks  
22 come to you directly --

23 A Yes.

24 Q -- when you get them?

25 A Yes.

1 Q They come to you at your home?

2 A Yes.

3 Q And the EFTs go into your account?

4 A Yes.

5 Q One account?

6 A Yes.

7 Q Same account for all royalties?

8 A For now, yeah.

9 Q Okay.

10 A Well, what period of time, from 2016, because I've  
11 changed banks.

12 Q 2016 to present.

13 A Well, it's not always the same account. I changed  
14 banks.

15 Q Okay. So what banks did you initially use when you  
16 opened the estate?

17 A What was it called, I don't remember. What's the name  
18 of that bank.

19 Q Was it in Washington State?

20 A Yes.

21 Q Okay. Was it close to your home?

22 A No.

23 Q Okay.

24 A It started with a P. I don't remember the name of the  
25 bank.

1 Q PNC?

2 A No, no, they don't have that out in Washington.

3 Q Approximately when did you open your current account?

4 A About 20 -- Bernie died in '16, maybe 2019 or 2020  
5 maybe.

6 Q And what bank is that?

7 A It's a credit union, WECU.

8 Q WECU, what does that stand for?

9 A Whatcom Educational Credit Union.

10 Q Okay. And you receive royalties in no other account?

11 A No.

12 Q What other sources of royalties do you receive other  
13 than those that you receive for Mr. Worrell's time  
14 working with any of Mr. Clinton's groups?

15 A I'm sorry, say the question again. What other  
16 royalties do I receive from what?

17 Q From any other source than the sources that are  
18 attributable to Mr. Worrell's work with Mr. Clinton?

19 A Les Claypool, Bernie -- Bucket of Bernie Brains.  
20 Colonel Claypool Bucket of Bernie Brains, that's Les  
21 Claypool. Who else, I can't recall them. Oh, other  
22 royalties, okay, that would also include back then  
23 ASCAP and BMI but not anymore.

24 Q Okay. But ASCAP and BMI collect royalties for various  
25 artists, as I understand it, correct?

1 A That's what I understand.

2 Q Okay. So what artists are ASCAP and BMI collecting  
3 for that are not a group associated with Mr. Clinton?

4 MR. QUICK: I just think there was  
5 confusion because you were asking currently and she  
6 said she's not receiving anything from BMI and ASCAP  
7 now.

8 Q (Continuing by MR. ALLEN): Okay, all right. So when  
9 did the BMI and ASCAP royalties cease?

10 A Within the past two or three years.

11 Q And what were they attributable to, what works were  
12 ASCAP and BMI collecting royalties for?

13 A I -- pages and pages. I, I, I can't -- I don't know,  
14 I can't give you that definition.

15 Q How many tracks that you know that you're receiving  
16 royalties for have a source other than Mr. Clinton's  
17 groups?

18 A There are but I just don't recall off the top of my  
19 head which they are.

20 Q I see that in one of the years, I believe 2016, it's  
21 not on the document itself but Mr. Worrell received  
22 royalties from AFM and SAG-AFTRA?

23 A Yes.

24 Q What are those for?

25 A Musicians union.

1 Q Okay. And so your --

2 A I get Bernie's, half of his pension.

3 Q So his full pension would be twice the 3663, correct?

4 A What's 3663?

5 Q Thirty-six sixty-three is the amount of royalties that  
6 -- or pension that --

7 A Can you put a period in there somewhere, \$36?

8 Q I'm sorry, \$3,663.

9 A Is that per year?

10 Q I don't know. It's listed here on your schedule one  
11 1040 line 8Z, other income.

12 A It's \$371.95 per month.

13 Q Okay. And what did Mr. Worrell do to earn the pension  
14 that he's getting from AFM and SAG-AFTRA?

15 A He was a member of the union, the musicians union.

16 Q And that is for in part monies that he received  
17 working for Mr. Clinton, correct?

18 A No.

19 Q Okay. So it's your position that your husband was not  
20 paid according to union scale during his time working  
21 for Mr. Clinton?

22 A In the beginning, if I remember correctly, George was  
23 a signatory with the union and for those times, yes.  
24 But after that he was no longer a signatory costing  
25 Bernie a lot of money.

1 Q Okay. And at what point did Mr. Clinton no longer  
2 continue with his signatory?

3 A You'd have to ask him.

4 Q Was it in the 1970's, do you recall, or was it --

5 A Probably.

6 Q -- the 1980's?

7 Okay. I notice that you've received some  
8 royalties from Sound Exchange, Inc.?

9 A Not very much.

10 Q And is that attributable to your husband's work with  
11 Mr. Clinton?

12 A It's attributable, attributable to much that Bernie  
13 did, Clinton being a part of it.

14 Q Who else would have been a part of it?

15 A Oh, good God, whoever Bernie performed with.

16 Q All right. What about GEP Talent Services, LLC,  
17 what's that?

18 A I think that is a royalty that comes from Bernie  
19 appearing on the Bernie Mac Show. It's not very much.  
20 I mean I get a check for \$4.31 or something. GEP  
21 Talent, I don't know, that's a company that pays for a  
22 lot of different entities.

23 Q Okay. Is any of that income, it's not broken down  
24 here, attributable to your deceased husband's work  
25 with Mr. Clinton?

1 A No.

2 Q All right. The Film Musicians Secondary, what's that  
3 for?

4 A That's where Bernie lost a lot of money when he  
5 stopped being a signatory, because what the union does  
6 is they take all the contributions and then with some  
7 ratio, only they understand they portion out money to  
8 musicians based on the number of sessions that they've  
9 done. So he's lost a lot of money 'cause of that.

10 Q Have you ever challenged the Film Musicians  
11 Secondary --

12 A Yeah.

13 Q -- calculations?

14 A And they're the ones that told me that he's no longer  
15 the signatory, therefore, what Bernie did that wasn't  
16 a session wasn't, you know, counted for them.

17 Q Did you do anything to determine whether or not they  
18 were telling you the truth?

19 A Like what?

20 Q Did you sue them?

21 A No.

22 Q Okay. So --

23 A I believe them.

24 Q Okay. So you just decided to believe what they told  
25 you?



1 A Based on George Clinton's behavior towards Bernie  
2 financially, yes, I had no reason not to.

3 Q And you have no concerns about the behavior that  
4 record companies and other industry folks do to  
5 exploit largely African American musicians that would  
6 cause you to have any sort of concern about whether  
7 they're telling you the truth?

8 A Is there a specific question for Bernie in there  
9 somewhere?

10 Q The question's for you, ma'am. Do you have the same  
11 suspicions about other people in the industry who are  
12 also ripping people off?

13 A Well, if they're not ripping Bernie off, I don't care.

14 Q Okay. Well, what did you do to ascertain whether or  
15 not Film Musicians Secondary was ripping Bernie off  
16 other than take their word that go chase George  
17 Clinton?

18 A They didn't tell me to go chase George Clinton.  
19 You're putting words in my mouth. What I said was  
20 they had no records of George being a signatory to the  
21 union, which is where that money derives from. And,  
22 therefore, that was why Bernie's income, that specific  
23 income, went down so low.

24 Q Okay. They don't have any records from 1975?

25 A They who?

1 Q The people who you just said have no records of Bernie  
2 receiving pay -- or the contributions being made?

3 A No, they said they didn't have any records of George  
4 contributing as a signatory to the union.

5 Q Okay. Did you do anything to challenge the accuracy  
6 of their claim that they have no records?

7 MR. QUICK: Asked and answered.

8 MR. ALLEN: It's not been asked and  
9 answered.

10 A Why, why would I? I knew they were telling --

11 MR. QUICK: Don't, --

12 THE WITNESS: Okay.

13 MR. QUICK: -- don't argue with him, just --

14 THE WITNESS: Okay, okay.

15 MR. QUICK: -- yes or no, if you can.

16 A No.

17 Q (Continuing by MR. ALLEN): Thank you. I see that you  
18 receive some royalties from BMG Rights Management.  
19 What's that for?

20 A Miscellaneous sessions Bernie did.

21 Q Sessions for whom?

22 A I have no idea. Bernie did a tremendous amount of  
23 work.

24 Q So some of those -- you have no idea, some of those  
25 sessions could have been from Mr. Clinton?

1 A Oh, no.

2 Q Well, you said you had no idea.

3 A Well, they weren't from him.

4 Q How do you know that?

5 A Because I would have remembered that name. And BMG,  
6 there isn't that much money.

7 Q Okay. But who did he do the sessions for where he --

8 A I don't remember.

9 Q Okay. What about Prawn Song Records, what's that?

10 A Colonel Claypool Bucket of Bernie Brains.

11 Q So that's the Les Claypool?

12 A Yes.

13 Q And that's only attributable to his work with Les  
14 Claypool?

15 A Yes.

16 Q All right. There's a line item here for Sound  
17 Exchange, Inc. Do you know what those royalties were  
18 for?

19 MR. QUICK: Asked and answered.

20 A Yeah, I did answer that already.

21 Q (Continuing by MR. ALLEN): Okay. But this is a  
22 different, this is a different year so --

23 A The answer would be the same throughout the years.

24 Q So you don't know what portion of the Sound Exchange  
25 royalties are related to work with Mr. Clinton versus

1 other third parties?

2 A Is that a question?

3 Q Yes, it is.

4 A No.

5 Q Again these are not labeled by year, so I can't tell  
6 you what year this relates to, but it says AFM and  
7 SAG-AFTRA IP Rights Fund. Do you know what that's  
8 for?

9 A One Bernie performed and was also on a TV show. If he  
10 was performing, that is AFM, American Federation of  
11 Musicians. SAG-AFTRA's Screen Actors Guild. Would be  
12 if he appeared even momentarily and that would  
13 probably be the Bernie Mac Show, or any other show  
14 that Bernie actually appeared on.

15 Q Okay. And none of it -- what if there was an  
16 appearance on Soul Train as Parliament-Funkadelic,  
17 could that be --

18 A Yeah, that could be.

19 Q Okay. So it's just not Bernie Mac stuff?

20 A No. I don't know who all it is.

21 Q All right. Who would?

22 A Or was.

23 Q Who would?

24 A Who would?

25 Q Yeah.

1 A The box of destroyed papers.

2 Q Have you made any effort to reach out to AFM and  
3 SAG-AFTRA to determine whether or not they're  
4 providing their appropriate share of what Mr. Worrell  
5 should be getting?

6 A When Bernie first died, I did. And that's when they  
7 explained to me.

8 Q Okay. But in subsequent years what if they shorted  
9 you, have you ever questioned whether or not they're  
10 shorting you?

11 A No, I'm too busy getting the person who shorted Bernie  
12 the most.

13 Q And did you request an audit of that information?

14 A No.

15 Q Did you request an audit for any of these payors of --

16 A No.

17 Q -- royalties?

18 A No.

19 Q So you don't know whether you're getting the accurate  
20 share from them or not, do you?

21 A I don't understand the question.

22 Q Well, are you just assuming what you get in the  
23 statements is accurate?

24 A Yes.

25 Q Okay. But when it comes to Mr. Clinton, you

1 automatically question it because you don't like him,  
2 right?

3 A Not because I don't like him.

4 Q Okay.

5 A Because I was looking at his history of what he did to  
6 Bernie and when he did it and how he did it.

7 Q Okay. Well, you've made a lot of statements about  
8 what Mr. Clinton did, and I'm just trying to ascertain  
9 specifically what it was that you think he did other  
10 than not pay him what you think your husband was  
11 worth.

12 A Isn't that enough?

13 Q Is that it?

14 A That's basically it.

15 Q Okay. So you just think Mr. Clinton should be paying  
16 more money?

17 A I know he should have been paying more money.

18 Q All right. Now I'd like to know what is the basis for  
19 your conclusion that you know Mr. Clinton should be  
20 paying you more -- should have paid your husband and  
21 now his estate more money, what is it?

22 MR. QUICK: I'll object to the extent it  
23 calls for a legal conclusion. Go ahead.

24 A I really don't know how to answer that because George  
25 did so much to Bernie that when I began tracking it,

1 and finally got Bernie to see what was going on,  
2 that's how I know.

3 Q (Continuing by MR. ALLEN): Okay. So what did you  
4 track specifically?

5 A The audit was one example.

6 Q So the audit from 1980's, there's been --

7 A That's one example.

8 Q All right. What's the second example?

9 A There was so many I just -- I mean I don't even know  
10 where to start. That's why I have an attorney.

11 Q We've got five and a half hours, ma'am, is --

12 A No, that's not going to jog my memory. My memory is  
13 what it is.

14 Q Okay. So sitting here today the only thing that you  
15 can point to, the only evidence that will be in this  
16 trial that you can provide, is that Mr. Clinton  
17 shorted your husband, that's it?

18 A No, that's not the only evidence.

19 Q Okay. Then tell me what other evidence you have to  
20 support a claim that Mr. Clinton shorted your husband.

21 A I think I've sent what I have to my attorney. I don't  
22 remember specifically what everything is. But based  
23 on Bernie's participation and what he did and how  
24 valuable he was, --

25 Q Okay.

1       A     -- a person would have to be a idiot to think that the  
2             paltry sums of money he got were what he was supposed  
3             to get.

4       Q     Now what it is that makes you conclude that it's  
5             Mr. Clinton that shorted your husband money?

6       A     Mr. Clinton is the only person in his camp that makes  
7             decisions. In Bernie's camp I'm the person that makes  
8             decisions. So if Bernie wasn't getting the money for  
9             sessions, if he wasn't getting his backpay, if he  
10            wasn't getting paid his royalties, that all fell right  
11            at the foot of the only person whoever made decisions.  
12            Everybody else were minions and whatever. Only George  
13            made those decisions.

14      Q     Okay. Now who pays these royalties; is Mr. Clinton's  
15             name listed as a payor on any of these royalties?

16      A     I have no idea.

17      Q     So what if Mr. Clinton isn't getting the royalties,  
18             what --

19      A     Then he should sue them.

20      Q     Okay. But have you ever considered the possibility  
21             that perhaps Mr. Clinton isn't getting the royalties  
22             that he should be getting?

23      A     No, not at all.

24      Q     Okay. Have you ever audited his books?

25      A     Audited whose books?



- 1 Q Mr. Clinton's books.
- 2 A Thang, Incorporated.
- 3 Q Okay. That was again the one time in 1980, correct?
- 4 A Uh-huh.
- 5 Q All right. That was 44 years ago?
- 6 A Uh-huh.
- 7 Q What efforts have you undertaken to ascertain what
- 8 Mr. Clinton is receiving?
- 9 A I don't care what he's receiving. Why would I look
- 10 into that?
- 11 Q Well, if he's not getting paid royalties, obviously he
- 12 can't pay you royalties.
- 13 A Hmm. It was obvious he was getting whatever he was
- 14 getting. I didn't care. I only cared about what
- 15 Bernie was not getting.
- 16 Q Okay. So you've made no effort to determine whether
- 17 or not the record companies in this case are the ones
- 18 who are shorting your husband?
- 19 A And how would I do that?
- 20 Q Well, you sued him in this case, right?
- 21 A Ah, I did try. I was recommended to go see these
- 22 three attorneys in New York. And I took some boxes
- 23 over to them and they called me up and they told me
- 24 that Bernie did have a case. He was the only one with
- 25 clean hands, but George Clinton had the deep pockets.

1 And of course lawyers have to pay their mortgages and  
2 whatever too so...

3 I did, I did try again. And at that point,  
4 like I said to him, when somebody takes all of your  
5 money, you don't have the money to pay the attorney to  
6 go back and get the money the person took from you.  
7 So that's the answer.

8 Q Okay. But you just made a statement that Mr. Clinton  
9 took money from you, and I've asked you what evidence  
10 do you have?

11 A Did I say take, then I misspoke. Did not pay Bernie.  
12 I don't want to say he took anything. He did not pay  
13 Bernie.

14 Q Pay Bernie with what?

15 A Same thing you get paid with.

16 Q Okay.

17 A Wampum.

18 Q Wampum?

19 A Wampum, money, whatever.

20 Q But you would agree that if Mr. Clinton has not  
21 received any money that is your husband's money, that  
22 he can't use that money to pay you, correct?

23 A I would not agree to that at all.

24 Q So what evidence do you have today that Mr. Clinton is  
25 holding money that should have been paid to your

1           deceased husband or his estate?

2       A     I don't know. I don't know how to answer that  
3           question.

4       Q     Okay. Have you looked at his bank statements?

5       A     Whose bank statements?

6       Q     Mr. Clinton.

7       A     Of course not.

8       Q     Have you looked at his income tax form?

9       A     Of course not.

10      Q     Have you audited Thang since 1980?

11      A     Of course not.

12      Q     Okay. There was a decision made in this case to  
13           release the record companies from litigation. What  
14           role did you play in making a decision to dismiss the  
15           record companies in this case?

16      A     I have attorneys.

17                   MR. QUICK: In answering that don't reveal  
18           attorney/client privilege communications.

19                   THE WITNESS: Okay.

20      Q     (Continuing by MR. ALLEN): What role did you have?

21      A     None.

22      Q     So Mr. Quick violated the rules of professional  
23           conduct and just dismissed a party without consulting  
24           you?

25      A     I didn't say that.

1 Q Okay. So you had a role, right? He didn't dismiss  
2 the case without your approval, did he, against these  
3 record companies?

4 A Are you asking me why my attorneys made a legal --

5 Q No, no.

6 A -- decision?

7 Q No, no. I'm asking you what role you played in  
8 deciding to release the record companies from this  
9 case?

10 A I don't -- that's not what I do. I hire the  
11 professionals to do their job, then they come back and  
12 advise me. I don't instruct them.

13 Q I'm not asking you what Mr. Quick told you. I'm  
14 asking whether or not you played any role in the  
15 decision to dismiss the record companies?

16 A No.

17 Q Turning to Sound Exchange, Inc., what are those  
18 royalties for?

19 A I'm --

20 MR. QUICK: Asked and answered three times.

21 MR. ALLEN: I'm on a different undated page  
22 that you gave me of the five of the 10 years that --

23 MR. QUICK: And she told you previously,  
24 when you asked about Sound Exchange the second time,  
25 that it applied to all of the years. Her answer

1 applied to all of the years.

2 Q (Continuing by MR. ALLEN): Okay. And how about  
3 Mascot-Provogue?

4 A Who?

5 Q Mascot-Provogue, P-R-O-V-O-G-E (sic)?

6 A I have no idea.

7 Q You don't know what that's for?

8 A No.

9 Q American Society of Composers, what's that?

10 A ASCAP.

11 Q Okay. And are there any royalties that you receive  
12 from ASCAP that are not attributable to your deceased  
13 husband's work with Mr. Clinton or his groups?

14 A Are you asking me were there other acts that Bernie  
15 performed -- wrote -- wait a minute, ASCAP is  
16 composing. Yeah, Bernie worked with other people  
17 besides George.

18 Q Okay. And is he receiving royalties for that work?

19 A Yes.

20 Q Okay. What groups, other than the groups associated  
21 with Mr. Clinton, are part of the royalties \$19,132  
22 that were from groups not associated with Mr. Clinton?

23 A I don't know, I'd have to look at the ASCAP list.

24 Q Okay. Is it your belief that the majority of the  
25 ASCAP money that's represented here on the schedules

1           you've provided is from Mr. Clinton -- the work your  
2           husband did with Mr. Clinton?

3       A     Yes.

4       Q     Broadcast Music, Inc. --

5       A     BMI.

6       Q     -- that's BMI, right?

7       A     Yes.

8       Q     There's 18,083 in one of these years. Is there any  
9           work that your husband did for acts other than the  
10          ones associated with Mr. Clinton that are reflected  
11          here in that 18,083?

12      A     Yes.

13      Q     And which acts are those?

14      A     I don't know, I'd have to see the list.

15      Q     Okay. Same question as before, is the majority of  
16          that \$18,083 attributable to work with groups  
17          associated with Mr. Clinton?

18      A     I think so.

19      Q     All right. Film Musicians Secondary Market, what's  
20          that for?

21      A     I told you about that, that's where the AF of M,  
22          American Federation of Musicians, takes all of the  
23          monies that come in from musicians who've done  
24          sessions with people who are signatories. And at the  
25          end of the year -- well, actually around July 1st,

1           they take that money and buy a phono known only to  
2           them, they divide it between those working musicians  
3           who did those sessions.

4       Q     Okay. Do you have any idea as to whether or not any  
5           of those royalties are associated with groups other  
6           than the ones associated with Mr. Clinton?

7       A     For, for the last one you asked me about, --

8       Q     Uh-huh.

9       A     -- they're not associated with George. He wasn't a  
10          signatory of the union. They were other people.

11      Q     Okay. But this is for films in which musicians --

12      A     That's what they call it, Films -- M -- FSM something  
13          or other.

14      Q     Right. So is it your understanding that the tracks  
15          that the Film Musicians Secondary Market is paying  
16          royalties on are tracks that were created with  
17          Mr. Clinton?

18      A     No, they were sessions Bernie did with other people.

19      Q     Got it, okay, that's all I wanted to know.

20                       How about GEP Talent Services?

21      A     I don't remember who they are.

22      Q     And you don't have any evidence that that line item  
23          involves people other than -- or acts other than those  
24          associated with Mr. Clinton?

25      A     George has nothing to do with that.

1 Q Who does?

2 A I don't remember. I'd have to see the list of the  
3 people who Bernie worked with that year.

4 Q Well, these are all for periods of time after your  
5 husband was deceased, so he wouldn't have been working  
6 with any of them in the year that this --

7 A Well, in the year before he died he would have been  
8 working with them.

9 Q Okay. Well, --

10 A The royalties would continue to come in.

11 Q All right. Isn't it true that the majority of the  
12 royalties that you are receiving -- and I won't go  
13 through all of them here because we've got two more  
14 pages and I'm getting tired of going through this.  
15 But isn't it true that the majority of the royalties  
16 that you are receiving are attributable to work that  
17 your husband did with Mr. Clinton?

18 A Which royalties?

19 Q Well, we can go through the whole list, ma'am. I'm  
20 talking about in general. You get a certain amount of  
21 money every year for royalties. Is the majority of  
22 what you're getting in royalties attributable to time  
23 or work that your husband performed with groups  
24 associated with Mr. Clinton?

25 A I don't think any of that has to do with when he



1 performed. That has to do with writing most of that.

2 Q I'm sorry, ma'am, let me ask it that way then because  
3 you're right.

4 Is a majority of the royalties that you're  
5 receiving attributable to work at all that your  
6 husband did, not perform but did, with Mr. Clinton?

7 A Yes.

8 Q Okay. Now have you made any effort to ascertain  
9 whether Mr. Clinton is receiving a similar amount?

10 A No.

11 Q Okay.

12 A No.

13 Q Now Mr. Clinton, in his capacity as leader of the  
14 bands, creator of the bands, it's not his  
15 responsibility to collect the royalties, is it?

16 A I have no idea.

17 Q Okay. Well, you referenced ASCAP, BMI. Aren't those  
18 the organizations that typically collect royalties?

19 MR. QUICK: Which royalties?

20 MR. ALLEN: The ones that are listed as  
21 ASCAP and BMI here.

22 A Those are writer royalties and publishing royalties I  
23 believe. And so whoever -- for instance -- I don't  
24 know how to explain this about ASCAP. I would think  
25 you'd know this, let me see.

1                   Sometimes if Bernie was doing a song and I  
2                   would send in information to ASCAP and BMI, or Kobalt.  
3                   Other times whoever contracted for Bernie to do the  
4                   songs would do it. In the case of sampling, I don't  
5                   know who did it.

6       Q       (Continuing by MR. ALLEN): So was that the case for  
7                   the entire approximately 50 years you were his  
8                   manager?

9       A       Just about.

10      Q       Did you make any efforts to register any sound  
11                  recording copyrights that --

12      A       No, I don't remember.

13      Q       Okay. So in the 50 years that you managed your  
14                  husband you never registered any sound recordings in  
15                  his name?

16      A       (A) I didn't manage Bernie for 50 years; and (B) I  
17                  don't remember if we registered any sound recordings.

18      Q       Okay. Well, how many years was it? You said you were  
19                  together for 50 years.

20      A       Almost 50 years. Well, in the beginning I just helped  
21                  him out with -- he called me his business manager so  
22                  he didn't have to be bothered with money and paying  
23                  bills. After we re-married after the divorce is when  
24                  he wanted me to be his manager.

25      Q       Well, you've represented previously that you were

1 his -- the nature of your duties may have changed but  
2 you considered yourself his manager almost from the  
3 beginning?

4 A No, I did not. I said business manager in the  
5 beginning. I never wanted to be his manager.

6 Q What does a business manager do as opposed to a  
7 manager?

8 A I told you. When money came in, bills needed to be  
9 paid, I handled that.

10 Q Okay. Were those household bills or --

11 A Any bills.

12 Q Okay. And what sort of bills did you pay that were  
13 not related to household expenses?

14 A If Bernie wanted to buy a keyboard, medical, a lot of  
15 medical bills for my son, life.

16 Q Tell us about the first instance in which you met  
17 Mr. Clinton.

18 A I was at the Apollo Theater where I had gone to wait  
19 for him to come to negotiate Bernie going out on the  
20 road with him.

21 Q Okay. So I believe you've said that he walked in in a  
22 white sheet and bare feet from --

23 A Uh-huh.

24 Q -- the street on New York --

25 A Into the Apollo Theater.

1 Q Okay. And you were in a three piece suit there to do  
2 business, right?

3 A That's what I wore to work.

4 Q And you were there to work, correct?

5 A Not really. At that point I was just doing a favor  
6 for Bernie. I worked for another company and I hadn't  
7 gone home to change.

8 Q But you negotiated his first contract at that point,  
9 it was over --

10 A I negotiated his first performance fees.

11 Q And what were the terms of that agreement?

12 A Again, \$200 a week whether or not he worked.

13 Q And that's it?

14 A Yes.

15 Q Nothing else in there?

16 A It was performance.

17 Q Got it. Initially you had a positive relationship  
18 with Mr. Clinton; you thought he was highly  
19 intelligent, gave him some books to read and that sort  
20 of thing?

21 A When I first meet people, I'm generally open to them  
22 unless they do something to show me not to be.

23 Q Okay. So how long did the period of time where you  
24 held Mr. Clinton in somewhat positive light, how long  
25 did that period last?

1 A Until I found out what he was doing to Bernie.

2 Q And when was that?

3 A It was in Detroit and George used to walk past me, I'd  
4 be sitting reading a book, to go on stage and as he  
5 walked past me, he'd put a wad of money in my hand,  
6 which I just stuck in my pocketbook. To this day I  
7 don't know how much money it was. He's come back out,  
8 I given it back to him.

9 The group was staying in a place, everybody  
10 was very unhappy, nobody was getting paid. George is  
11 living in a house. Everything with George was  
12 wonderful. Everybody else was going crazy. They  
13 weren't eating. It got to a point where at the  
14 Hollander House I offered to cook for them if they  
15 would all pool the money together.

16 And I began thinking to myself how is he  
17 doing this and how is he doing that and how is he  
18 doing the other and they have nothing and Bernie had  
19 nothing. So I sat back and I watched and listened.  
20 And the more I listened, the more I saw how deplorable  
21 things were.

22 Q And you laid the entirety of that state of affairs at  
23 the feet of Mr. Clinton, correct?

24 A You lay the entirety of not getting your money from  
25 the person that's supposed to pay you.

1 Q Okay.

2 A Whoever that may be.

3 Q Now if Mr. Clinton wasn't getting paid, did you ever  
4 seek to hold to account the people who, promoters,  
5 record companies and such, who weren't paying?

6 A I was never involved in all that. And if George  
7 Clinton can walk by and hand me a wad of money and my  
8 hand is this big -- witness indicating -- then he can  
9 pay my husband.

10 Q So this wad of money happened when he was going on  
11 stage to perform?

12 A At The 20 Grand specifically.

13 Q And were you aware that there were sound engineers  
14 that had to be paid?

15 A Not back then.

16 Q There was rent to The 20 Grand that had to be paid?

17 A Rent?

18 Q Well, there was a fee for using the venue, correct?

19 A I have no idea.

20 Q Okay. So you don't know what that money was  
21 attributed -- or was going towards, do you?

22 A I didn't care.

23 Q Right. You never asked?

24 A No. What I, what I asked was where's Bernie's money.

25 Q And if the money was going towards the cost of

1 producing records and paying roadies and other folks  
2 on a tour, you wouldn't know that then?

3 A That's a hypothetical. You're saying if.

4 Q That is a hypothetical. You --

5 A I have no way of knowing. Listen, when you hire  
6 somebody, you have a hierarchy of how you pay them.  
7 Any housewife knows that. And if you don't put your  
8 musicians before your roadies and your drug abuse and  
9 all the rest of that, that's your problem. It comes  
10 back to my husband still deserves to get his money.

11 Q So if the roadies and -- well, let me ask you this  
12 question. You were involved in a music festival a  
13 while back in 2015, a festival called We Want the Funk  
14 Music Festival, Wall Street International, do you  
15 remember that?

16 A No.

17 Q Okay.

18 A Where was that?

19 Q I believe it was in New York, ma'am.

20 A What month?

21 Q Would you like to see the videotape?

22 A No. I can't look at pictures of Bernie yet.

23 Q I'm sorry?

24 A No.

25 Q Okay. Do you recall a situation where there was a

1 music festival that went all day with Bernie  
2 headlining at night and he went on stage and the mics  
3 were muted and were not unmuted?

4 A Oh, Philadelphia.

5 Q It's not clear from the video, ma'am, what city it's  
6 in. I'm happy to show you the video.

7 A Well, no. What's your question?

8 Q Do you recall that occurring?

9 A Maybe if it was in the -- if it was the one in  
10 Philadelphia.

11 Q Do you recall a situation where your husband showed up  
12 to do his gig and the sound musicians would not turn  
13 on the sound?

14 A No. If it was in Philadelphia, they shut the sound  
15 off because they hadn't been paid.

16 Q Correct.

17 A That's right.

18 Q So you do recall it?

19 A If it's the one in Philadelphia, yes.

20 Q It's the one in Philadelphia I believe, ma'am.

21 So while there's a hierarchy of payments,  
22 if you don't pay certain people, you can't perform.  
23 And if you can't perform, you can't get your money and  
24 you can't pay your musicians.

25 So you would agree with me that it is



1           important that the people who produce concerts are  
2           paid so that the concerts can go forward?

3       A     Theoretically, yeah.

4       Q     So you don't know that that wad of cash that  
5           Mr. Clinton stuck in your hand went to taking care of  
6           the venue and all the people who --

7       A     It was not my business. I was only concerned with  
8           Bernie getting paid and he did not. And in that  
9           part -- well.

10      Q     And you've stated you don't know how much money was in  
11           the wad of cash that day, do you?

12      A     No, that's why he handed it to me. He knew --

13      Q     You never looked at it?

14      A     -- I was trustworthy. No.

15      Q     You never looked at it?

16      A     I never looked at it.

17      Q     So you would agree that there's a qualitative  
18           difference and a quantitative difference between  
19           handing you a wad of one dollar bills versus a wad of  
20           one hundred dollar bills?

21      A     Only if you're a comedian.

22      Q     Okay, right. But you didn't look at it so you don't  
23           know how much money was there?

24      A     No.

25      Q     But you assumed that it was Mr. Clinton being

1 dishonest and deceitful to the members of his band?

2 A I never said that.

3 Q Okay. Then maybe I'm not using the specific words  
4 that you used, but what was your assumption that  
5 Mr. Clinton was doing with the money?

6 A When he handed me that money?

7 Q Yeah.

8 A Well, being as he was performing in a sheet with no  
9 underwear I figured that he was, you know, bereft of  
10 any pockets, so he knew that I was trustworthy and he  
11 handed it to me.

12 Q You said that at one point that all you did, as time  
13 went by, was to facilitate his being able to play.  
14 And when he asked you to be his manager, it was your  
15 job to make sure the paperwork was correct. Is that a  
16 true and accurate statement?

17 A No.

18 Q Okay. So would you like me to play for you the  
19 statement that you made in the interview that you gave  
20 in the Truth in Rhythm podcast?

21 A No, you can just read it. I don't want to hear it.

22 Q Okay.

23 A What am I supposed to --

24 Q So there's a statement attributed to you that said,  
25 and I heard it, all I did as time went by was

1 facilitate it. And the it it's referring to was --  
2 let me start with the previous sentence.

3 You're referring to Mr. Clinton in this  
4 statement. On the artistic side you could see  
5 something was there, but on the business side  
6 obviously left a lot to be desired. When it came to  
7 the music, artist's side or anything like that at all,  
8 I didn't do anything.

9 So you didn't have anything to do with the  
10 music side?

11 A Oh, no.

12 Q All right. That was always Bernie's. If Bernie  
13 wanted to play something, Bernie did it?

14 A Right.

15 Q All I did as time went by was to facilitate it and  
16 then when he asked me to be his manager and make sure  
17 paperwork was correct, period. The only time I had  
18 any input at all was, in the music, was when I  
19 co-wrote two songs, okay.

20 So my question is --

21 A Do I mention those two songs?

22 Q Red Hot Mama and the second track on Osmium.

23 A Livin' The Life.

24 Q Yes. Great lyrics. Somebody who writes lyrics, I  
25 appreciate your lyrics.

1 A Well, I was particularly proud of Livin' The Life. We  
2 got a good review. It said basically the first time  
3 combining religion and, --

4 Q And ecology.

5 A -- and ecology.

6 Q Right.

7 A But I was never credited or paid either.

8 Q And you didn't ask?

9 A Why should I ask?

10 Q Well, plenty of people contribute a lyric or two that  
11 don't get credited.

12 A A stanza is not a lyric or two. And on page 18 of  
13 George's bio he admits Bernie's wife, Judie, as a  
14 co-writer of Red Hot Mama. So why am I going to go  
15 make a big deal out of it. It was more important to  
16 get Bernie's situation sorted out.

17 Q Okay. But you're not suing Mr. Clinton over --

18 A Two songs, --

19 Q -- a stanza and --

20 A -- no.

21 Q Okay.

22 A No.

23 Q So again, and maybe I'm having a little difficulty in  
24 understanding the change in your role pre-divorce and  
25 post-divorce, but you said when Bernie asked you to be

1 his manager, are you talking to -- you're talking  
2 about the period of time post-divorce?

3 A Post-divorce.

4 Q Okay. And it was your job to make sure that the  
5 paperwork was right?

6 A My job was to do whatever it need -- Bernie needed to  
7 have done.

8 Q Okay. And that would include making sure that his  
9 contracts were accurate?

10 A Maybe. It would depend on the contract. Are we  
11 talking gig contracts?

12 Q Talking about any contract.

13 A It would depend on the contract.

14 Q Okay. So if you weren't in charge of making sure that  
15 the contract was accurate, who was, anybody?

16 A Anybody that I decided to ask to do it. I would have  
17 to know which contract you're talking about to see to  
18 whom I gave it to or to get information.

19 Q Okay. Well, let's talk about the January 1, 1976  
20 contract.

21 A January 1, oh, back to that, okay.

22 MR. QUICK: That's not post-divorce.

23 Q (Continuing by MR. ALLEN): Well, was it still your  
24 job at that point to --

25 A 1976, no.

1 Q -- make sure that it was accurate?

2 A No.

3 Q But you believe it was accurate today, correct?

4 A I have no way of knowing. I think I answered that  
5 already anyway.

6 MR. QUICK: Let's take a break.

7 MR. ALLEN: Go ahead.

8 (WHEREUPON a short pause was  
9 had in the proceedings 11:27  
10 a.m. to 11:34 a.m.)  
11 (WHEREUPON Exhibit No. 9  
12 was marked for identification  
13 by the reporter.)

14 Q (Continuing by MR. ALLEN): Ms. Worrell, I handed you  
15 a copy of a pleading that was filed in the Nene  
16 Montez, Association Parliament-Funkadelic versus Armen  
17 Boladian, et al. It's a US District Court, Central  
18 District of California, case number CV-92-2685R.

19 It is a pleading purporting to be a number  
20 of -- actually it's not a pleading. It's a number of  
21 declarations that were filed, but I would just ask you  
22 to turn to the 16th page. At the bottom of the page  
23 it has a Bates stamp I think in this case 00016 or  
24 033848.

25 A Did you find 16?

1 Q Yeah, it's not numbered --

2 A Yeah, that I see.

3 Q -- but it says exhibit --

4 MR. QUICK: What's the GCFM number?

5 MR. ALLEN: 033848.

6 THE WITNESS: What's the exhibit?

7 MR. QUICK: I'll help you.

8 THE WITNESS: Oh, okay.

9 Q (Continuing by MR. ALLEN): That's where we're going  
10 to be headed, but I want you to take a look at the  
11 entire exhibit and let me know if you recognize it.

12 A Recognize what?

13 Q The exhibit, have you seen it before?

14 A No, I haven't seen this before, none of it.

15 Q Okay. My questioning is relatively brief on it.  
16 Actually if could turn to the next page, which would  
17 be three.

18 This is a itemized accounting of work that  
19 was performed by a law firm on behalf of Mr. Clinton.  
20 And there is a reference in paragraph 16, as you'll  
21 see, Bernie Worrell, negotiation of new agreement  
22 between Bernie Worrell and Thang; personal conferences  
23 with Judie Worrell, attorney for Bernie Worrell and  
24 client. Correspondence, seven hours at \$125 an hour.

25 This is a entry that apparently, according

1 to the first page, I think is attributable to an  
2 attorney by the name of Ina Maibach. Do you remember  
3 Ms. Maibach?

4 A Ina's George's attorney.

5 Q Right. Do you recall meeting with her and negotiating  
6 a contract, whether or not it actually came into  
7 being, but do you recall meeting with her?

8 A No -- well, I saw Ina from time to time, but I don't  
9 recall a meeting with her because she was George's  
10 lawyer, not Bernie's.

11 Q Okay. But if you were going to negotiate a contract  
12 with Mr. Clinton, it would be customary, would it not,  
13 to have a lawyer involved for him, right?

14 A Yes and no.

15 Q Okay. But do you have any reason to dispute that you  
16 did meet with Ms. Maibach in the furtherance of  
17 negotiating a new contract between Bernie Worrell and  
18 Thang?

19 A I don't remember.

20 Q The date of this letter is April 11, 1980, so  
21 obviously quite some time ago. And do you have any  
22 recollection as to ever negotiating any contract with  
23 Ms. Maibach on behalf of your husband?

24 A No.

25 Q Is it you do not recall it because it didn't happen,



1 or you do not recall because it was 44 years ago?

2 A Could be either one.

3 Q Okay. And you don't know sitting here today which one  
4 that -- which one it is, could be one or the other?

5 A Could be either one.

6 Q All right. So are you in a position to dispute that  
7 this meeting that's reflected in paragraph 16, Bates  
8 number GC-FM033849, do you have any evidence that it  
9 didn't happen?

10 MR. QUICK: Object to form, asked and  
11 answered.

12 A I don't know.

13 Q (Continuing by MR. ALLEN): So you don't know whether  
14 you have any evidence or you don't know whether it  
15 happened?

16 A Either one.

17 Q And if you had any evidence that it didn't happen, you  
18 would have provided it to your attorney, correct?

19 A Of course.

20 Q All right. And you aren't disputing that it happened,  
21 you're just saying you don't know whether it did or it  
22 didn't?

23 MR. QUICK: Objection, mischaracterizes her  
24 testimony.

25 A (Witness nods head.)

1 Q (Continuing by MR. ALLEN): You nodded your head, yes,  
2 ma'am; is that a yes?

3 A That's what I said.

4 Q Thank you. I just wanted to clarify.

5 Turning your attention back to, if you  
6 allow me to look at the numbers here, I believe  
7 Exhibit 1 -- no, I'm sorry, Exhibit 2, which is this  
8 one here, ma'am. Done?

9 A I'm waiting on you.

10 Q Okay. I'm asking you to look at paragraph eight.

11 A Okay.

12 Q It says in or about January 1976 defendant Thang and  
13 plaintiff entered into an agreement, hereinafter the  
14 agreement, whereby and pursuant to which defendant  
15 Thang did engage plaintiff to render certain artistic  
16 musical services to, and for the benefit of the  
17 defendant Thang, in connection with the production of  
18 certain phonographic recordings. A copy of the said  
19 agreement is annexed hereto as Exhibit A.

20 Do you see that?

21 A I see that.

22 Q Okay. Now if you look at the back of the document,  
23 there is no Exhibit A.

24 A I don't see that.

25 Q Do you have a copy of Exhibit A anywhere?

1 A No.

2 Q Okay. Is it your belief sitting here today that  
3 Exhibit A is in fact -- I believe we marked it Exhibit  
4 2, the --

5 MR. QUICK: One.

6 MR. ALLEN: Or, I'm sorry, Exhibit 1, yes,  
7 sorry.

8 Q (Continuing by MR. ALLEN): Is it your belief today  
9 that that exhibit that's referenced in paragraph eight  
10 is the agreement that should be attached as Exhibit --

11 A I don't know.

12 Q Okay. Was there another agreement that you're aware  
13 of, of January 1976?

14 A I don't know.

15 Q Okay. So you don't have any evidence today that there  
16 was another agreement other than the one that is  
17 Exhibit 1 to this deposition?

18 A I don't know.

19 Q No, I mean you don't know whether you have any  
20 evidence?

21 A I said I don't know.

22 Q Okay. If you did have any evidence that's relevant,  
23 you would have provided it to Mr. Quick, correct?

24 A Yes, definitely.

25 Q Paragraph nine says in accordance with the terms of

1 the said agreement, Exhibit A, among other things,  
2 defendant Thang did engage plaintiff to render certain  
3 phonographic recordings, and plaintiff did further  
4 agree to accept such engagement and did render such  
5 artistic musical services to defendant Thang.

6 Do you see that?

7 A I see that.

8 Q Do you agree with the statement that's set forth in  
9 paragraph nine?

10 A I don't know.

11 Q Okay. Do you have any evidence that would contradict  
12 the information in paragraph nine that your husband  
13 swore was truthful when he --

14 A I don't know.

15 Q -- filed this?

16 But if you did have evidence to that  
17 effect, you would provide it to your attorney,  
18 correct?

19 A Of course.

20 Q And you would have provided it, right?

21 A Of course.

22 Q Okay. Now I want you to go back and look at the  
23 document and tell me -- when I refer to the document,  
24 I'm referring to Exhibit 1 -- where in Exhibit 1 do  
25 you believe that there is entitlement to the sound

1 recordings that your husband made with -- a interest  
2 in the sound recordings that your husband made with  
3 Mr. Clinton in his various acts?

4 A I'm not sure.

5 Q Okay. Well, take your time and look at it.

6 A I'm not sure.

7 Q Well, I'll give you as much time as you need to read  
8 it, ma'am. I'm asking you to read it and tell me what  
9 section of that contract specifies that your husband  
10 has an interest in the sound recordings that he made  
11 with Mr. Clinton and his associated acts?

12 MR. QUICK: Form, foundation, legal  
13 conclusion.

14 A I'm not sure.

15 Q (Continuing by MR. ALLEN): Okay. Were there any  
16 other contracts that would have covered your husband's  
17 services to Mr. Clinton and in his various acts that  
18 have not been discussed today?

19 A I don't know. I don't think so.

20 Q Now the case that your husband filed and verified the  
21 Complaint in the early 1980's was eventually settled,  
22 was it not?

23 A I don't know.

24 Q You don't know?

25 A I don't remember.

1 Q Okay.

2 (WHEREUPON Exhibit No. 10  
3 was marked for identification  
4 by the reporter.)

5 Q (Continuing by MR. ALLEN): Did you take a look at  
6 that, ma'am?

7 A Yes.

8 Q Did you familiarize yourself with it?

9 A Yes.

10 Q Is that your signature?

11 A Yes.

12 Q So does that refresh your recollection as to whether  
13 or not there was a resolution to that dispute?

14 A I wouldn't call this a resolution.

15 MR. QUICK: Objection, calls for -- let me  
16 get an objection in.

17 THE WITNESS: Oh, I'm sorry.

18 MR. QUICK: Form and it mischaracterizes  
19 the exhibit.

20 Q (Continuing by MR. ALLEN): Okay. Well, what's your  
21 understanding of the exhibit, ma'am?

22 A That once again we had reached an agreement that was  
23 breached, later breached.

24 Q Okay. So that was an effort to resolve the litigation  
25 in 19 -- the 1980 --

1 A Uh-huh.

2 MR. QUICK: The 1981 agreement was a effort  
3 to resolve the 1982 --

4 MR. ALLEN: Dan, Dan, Dan, --

5 MR. QUICK: -- litigation.

6 MR. ALLEN: -- Dan, Dan. You know the  
7 rules. I asked a question, it's a valid question.  
8 It's on the table. Your client can answer it. If she  
9 doesn't understand it, I'll clarify.

10 MR. QUICK: So your view of the rules is  
11 that you can ask a question which you know to be false  
12 in order to confuse a witness.

13 MR. ALLEN: I don't, I don't know it's  
14 false.

15 MR. QUICK: You don't understand 1981 comes  
16 before 1982?

17 MR. ALLEN: I don't understand what the  
18 document is from your client's perspective. And I'm  
19 asking her what her understanding of the question is.  
20 I'm not trying to confuse anybody.

21 A And I answered you. I told you it was an agreement  
22 that was breached so it never was -- came to fruition.

23 Q (Continuing by MR. ALLEN): Okay. So that payment was  
24 never made?

25 A That's what I just said.

1 Q That's your testimony, okay, thank you.

2 (WHEREUPON Exhibit No. 11

3 was marked for identification

4 by the reporter.)

5 Q (Continuing by MR. ALLEN): Have you ever seen that  
6 document before, ma'am?

7 A I think so.

8 Q Okay. Who's Paul Schindler?

9 A He was Bernie's attorney way back when.

10 Q Okay. Do you recall other than 1980 what years he  
11 would have been Bernie's attorney?

12 A No.

13 Q Is there anything in this letter that you think  
14 Mr. Schindler misstated?

15 A Oh, no.

16 Q Is there anything in this letter that pertains to  
17 sound recordings?

18 A I don't know.

19 Q Is there something in the letter that you don't  
20 understand that I can help you -- I can help explain,  
21 but is there anything --

22 A No, you asked me is --

23 Q Is there anything in this letter that references your  
24 deceased husband's right to sound recordings?

25 A I don't know.



1 MR. QUICK: Objection. Excuse me,  
2 objection, form and foundation.

3 Q (Continuing by MR. ALLEN): Is the word sound  
4 recording anywhere listed in the document?

5 A No.

6 Q Okay. Would you agree with me that Mr. Schindler is  
7 not pursuing anything related to sound recordings in  
8 this letter?

9 MR. QUICK: Objection, form and foundation.

10 A I don't know.

11 Q (Continuing by MR. ALLEN): And is the term sound  
12 recording mentioned in this letter?

13 MR. QUICK: Asked and answered.

14 A I don't know.

15 Q (Continuing by MR. ALLEN): Ma'am, it's written in  
16 plain English so you have to know whether or not the  
17 words sound recording are in the document. It's not  
18 in the document, is it?

19 A I don't know.

20 Q Ma'am, there are approximately 60 words in here. Is  
21 the word sound, S-O-U-N-D, on this paper?

22 A It says royalty advances.

23 Q Okay.

24 A And that could well have been any entity so I don't  
25 know.

1 Q Okay. But what Mr. Schindler appears to be saying is  
2 that the payments as royalty advances are not royalty  
3 advances, isn't that what it says?

4 A Yes.

5 Q It says --

6 MR. QUICK: I'll object to form. Go ahead.

7 Q (Continuing by MR. ALLEN): And it says that the  
8 payment of the royalty advance -- or characterizing  
9 things as royalty advances is erroneous I believe is  
10 the word, or erroneously?

11 A Oh, yeah.

12 Q And it's the position of Mr. Schindler apparently that  
13 your husband was to receive payments for something  
14 other than royalty advances, correct?

15 A I don't know.

16 (WHEREUPON Exhibit No. 12  
17 was marked for identification  
18 by the reporter.)

19 Q (Continuing by MR. ALLEN): Have you had a chance to  
20 look at it, ma'am?

21 A Yes.

22 Q This Exhibit Number 12 is a document bearing the date  
23 of December 10, 1980 from an individual named Emily  
24 Shenkin who appears to be an attorney at Rosenfeld,  
25 Kasso and Kraus. And this is a letter to

1 Mr. Schindler, who is Mr. Worrell's lawyer, enclosing  
2 a schedule setting forth monies paid to Mr. Worrell in  
3 1979 and '80. Have you looked at the attachments,  
4 ma'am?

5 A Yes.

6 Q Do you have any evidence sitting here today that the  
7 figures that are set forth in these last two pages,  
8 the handwritten statement of royalty advances for 1980  
9 and '79, that these are inaccurate?

10 A Do I have any evidence?

11 Q Yes.

12 A Do they have any evidence that they paid it? Because  
13 if you'll notice, I'll draw your attention to where it  
14 says total advance royalties, and that's what Paul's  
15 talking about. Checks would come in and the bottom  
16 would say advance against royalties, or they'd be  
17 sessions checks or whatever, and they called  
18 everything advance against royalties.

19 Q Okay.

20 A And they were not.

21 Q Regardless of how they were characterized, ma'am, my  
22 question to you is do you have any evidence that the  
23 figures contained on these two statements are  
24 inaccurate?

25 MR. QUICK: In terms of the amounts?

1 Q (Continuing by MR. ALLEN): In terms of the receipt or  
2 the amounts?

3 A I would have no way of knowing for the reasons I just  
4 told you.

5 Q So you're not in a position to dispute the accuracy of  
6 the --

7 A Oh, I do dispute.

8 Q Okay. What evidence are you relying upon to dispute  
9 the figures set forth on the document here?

10 A I'm relying on them providing proof that they actually  
11 made these payments.

12 Q Okay, ma'am. So do you have any proof that the  
13 payments were not made? That's my question to you.

14 MR. QUICK: I don't know how you prove a  
15 negative. I'll object to form.

16 MR. ALLEN: I can name about 12 ways to  
17 prove a negative here, Dan. We can go through some of  
18 them if you'd like.

19 Q (Continuing by MR. ALLEN): My question's still  
20 pending, ma'am. Do you have any evidence to dispute  
21 the accuracy of these figures, and that the payments  
22 were -- let's start with the accuracy of the figures?

23 A I don't have no idea if the figures are accurate.

24 Q Okay. Let's try to break it down a little here.  
25 What's Bezerk Malformations?

1 A That was one of Bernie's companies when we first got  
2 together.

3 Q Okay. And was Mr. Worrell to receive \$400 on a  
4 regular or on any regular interval that you can  
5 recall?

6 A I don't know.

7 Q You were his business manager?

8 A I was handling certain things.

9 Q Okay. So at this --

10 A That he asked me to handle. This I wasn't handling.

11 Q So you don't know what these payments --

12 A No.

13 Q -- were for?

14 A I'm not even sure they were made. That's what -- you  
15 have to prove that to me.

16 Q And you're not sure that they weren't made?

17 A I'm not sure they were.

18 Q Okay. Then if you -- are you sure that they weren't  
19 made?

20 A If I'm not sure that they were, then I'm not sure that  
21 they weren't.

22 Q Thank you. And you don't have any evidence sitting  
23 here today that they weren't made, other than the fact  
24 that you don't like Mr. Clinton?

25 A Would you stop saying that.

1 Q Well, you said it.

2 A This is not personal. This is business.

3 Q Okay, all right.

4 A How I feel about George has never been asked.

5 Q Well, I think we did earlier today but...

6 A No. Anyway...

7 MR. QUICK: Stick to what's relevant.

8 A Yeah. I can't say that any of this was received. I  
9 have no knowledge. We're talking about what, 1979.  
10 Where are we now, 2024. The easiest way to know is to  
11 have them prove that they made the payments.

12 Q (Continuing by MR. ALLEN): Okay. But you would agree  
13 that a regularly kept business record is one way to  
14 prove that a payment was made, would you not?

15 A Not necessarily.

16 Q What efforts did you undertake to challenge the  
17 accuracy of any of this?

18 A I never saw these so I couldn't challenge it.

19 Q Did you ever -- did you communicate with -- you  
20 regularly communicated with your -- I'm not asking you  
21 what you communicated, but you regularly communicated  
22 with your attorney?

23 A I expressed my frustration to Paul that when monies  
24 came in, they were wrongly attributing them to  
25 Bernie's royalties. And that's what prompted Paul to

1 write that letter.

2 Q So do you have any reason to doubt that Mr. Schindler  
3 would have kept information from you?

4 A Oh, no.

5 Q Okay. So was Mr. Schindler received information, it  
6 was his practice to share it with you, was it not?

7 A Of course.

8 Q And any important information, you're sure he shared  
9 it with you, correct?

10 A He was an extremely good lawyer so of course, yes.

11 Q Extremely good lawyer, very thorough, correct?

12 A Yes, all of that.

13 Q So if there was a claim that he had to make in a case  
14 that was a valid claim, you don't have any reason to  
15 believe that he wouldn't have lodged that valid claim,  
16 would you?

17 MR. QUICK: Form.

18 A That's a hypothetical.

19 Q (Continuing by MR. ALLEN): Is there anything about  
20 your experience with Mr. Schindler that would lead you  
21 to believe today that in 19 -- in the early 1980's he  
22 would have not included a valid claim in any letter or  
23 Complaint that he filed?

24 MR. QUICK: Form, foundation and  
25 speculation.

1 A I'm not sure what you're asking me.

2 Q (Continuing by MR. ALLEN): I'm asking you whether or  
3 not he was -- I believe you said he was a very good  
4 lawyer?

5 A Yes.

6 Q Is it your opinion that very good lawyers fail to  
7 assert valid legal claims when they have the  
8 opportunity?

9 A I said Paul was a very good lawyer. I didn't say  
10 lawyers. When it comes to Paul, I trusted him, Bernie  
11 trusted him.

12 Q And you trusted him because you believed him to be --

13 A Because of our experiences with him.

14 Q Right. And part of that experience with him was that  
15 he was very thorough, and pursued all of the various  
16 legal avenues that you had in order to recover monies  
17 that you thought you had -- or that your husband  
18 thought he had --

19 A To the best of my knowledge, yes.

20 Q Okay. I apologize, I ask you to return to Exhibit 5  
21 again. Go ahead and take a look at it if you need to  
22 refresh your recollection to what's there.

23 A Just ask me your questions, there's so much of this.  
24 What do you want to know?

25 Q I want to know the paragraph in that Complaint where



1           your husband's lawyer made a claim for sound  
2           recordings, royalties of sound recordings or ownership  
3           of sound recordings.

4                   MR. QUICK:  Objection, foundation.  
5           Counsel, you're just playing games with a question  
6           like that.

7                   MR. ALLEN:  You know, Dan, I don't  
8           appreciate you trying to mischaracterize.  I'm asking  
9           questions that I don't know the answer to or --

10                  MR. QUICK:  You don't read English?

11                  MR. ALLEN:  -- that I want to find out what  
12           her understanding is, okay.  So I'm entitled --

13                  MR. QUICK:  You're asking her understanding  
14           as to a legal document from 1984?

15                  MR. ALLEN:  Yeah.

16   A       I don't know why 'cause I don't remember.

17   Q       (Continuing by MR. ALLEN):  Okay.  That's why I've  
18           given you the document to review.

19   A       It doesn't matter if I read this three times.  If I  
20           don't remember it, I do not remember it.

21   Q       Okay.  Well, I'm not asking you about your  
22           recollection in 1980.  I'm asking you to read it in  
23           2024 and tell me whether there is anything in there  
24           that makes a claim for sound -- interests in sound  
25           recordings?

1 A Why don't you show me what it is you think does that  
2 and then I will say whether or not it's so, because I  
3 don't see anything in here.

4 Q Ma'am, my position is that it's not in there and --

5 A Okay.

6 Q -- that I want to know whether you think it is.

7 A I don't know.

8 Q And if there is a reference to that, I'd like to know  
9 what it is.

10 A I don't know.

11 Q Okay. So you don't know whether your husband sought  
12 an interest in any sound recordings when he had the  
13 opportunity to do so in 1994 when he sued the  
14 defendants, some of whom are defendants in this case?

15 A I do not know.

16 Q Okay.

17 (WHEREUPON Exhibit No. 13  
18 was marked for identification  
19 by the reporter.)

20 Q (Continuing by MR. ALLEN): Have you had a chance to  
21 look at that, ma'am?

22 A Yes.

23 Q Now understanding that the document is not addressed  
24 to you, do you ever recall seeing this document?

25 A No.

1 Q All right. Do you recall that there was at one point  
2 a special master appointed to administer the royalties  
3 that were produced from works that Mr. Clinton and his  
4 various groups produced, performed?

5 A I knew that there was a special master.

6 Q And do you recall ever having any conversations with  
7 Special Master Friedman?

8 A No.

9 Q Or Jane Peterer at all, does that name sound familiar  
10 to you?

11 A I may have spoken to Jane one or two times.

12 Q Okay. And there was a period of time in 1996 at least  
13 where Mr. Friedman was the recipient of the royalties  
14 that were being paid out through various record  
15 companies. Do you recall that?

16 MR. QUICK: Form and foundation.

17 A I don't know.

18 Q (Continuing by MR. ALLEN): Okay. Isn't it true that  
19 Mr. Friedman was collecting royalties that were also  
20 due and owing to other members of the band like your  
21 husband?

22 A I don't know.

23 MR. QUICK: Form and foundation.

24 Q (Continuing by MR. ALLEN): Do you recall receiving  
25 any payments from the offices of Mr. Friedman for your

1 husband's share of royalties?

2 A I don't know.

3 Q Do you dispute the fact that Mr. Friedman, the court's  
4 appointed special master, paid you amounts -- or, I'm  
5 sorry, paid your husband amounts that he was entitled  
6 to for works that he produced with -- that he was  
7 involved with Mr. Clinton?

8 A I don't know.

9 MR. QUICK: Form and foundation.

10 Q (Continuing by MR. ALLEN): Who would have received  
11 payments that would have been made from the special  
12 master to your husband?

13 MR. QUICK: Foundation, calls for  
14 speculation.

15 A I don't know.

16 Q (Continuing by MR. ALLEN): Were you the business  
17 manager at this time that had responsibility for  
18 financial affairs, or were you just the --

19 A It would depend upon what year. Remember I divorced  
20 Bernie.

21 Q This would have been in 1996, ma'am.

22 A I don't remember when we got back together, '80's,  
23 '90's. I don't know.

24 Q Well, you do recall that you had communications with  
25 Mr. Friedman, do you not?

1 A No, I did not. I don't think so.

2 Q You never had any communication with Mr. Friedman?

3 A I don't think so.

4 Q You never complained to him that he wasn't providing  
5 you with the appropriate royalty amounts?

6 A I did send him a letter, yes, but I did not speak to  
7 him.

8 Q Okay. Do you have a copy of that letter?

9 A No.

10 Q Do you recall what you put in that letter?

11 A No.

12 Q Do you recall whether you made any claim for any  
13 interest in sound recordings?

14 A No.

15 Q Okay. And do you dispute that for many years up until  
16 today your husband has collected royalties, not for  
17 sound recording but royalties for mechanical liens --  
18 or, I'm sorry, mechanical royalties and for the  
19 compositions; you're getting them today?

20 A I'm sorry, what?

21 MR. ALLEN: Read my question back, please.

22 (WHEREUPON the reporter read  
23 back the question as follows):

24 QUESTION: "And do you dispute that for many years up  
25 until today your husband has collected

1 royalties, not for sound recording but  
2 royalties for mechanical liens -- or, I'm  
3 sorry, mechanical royalties and for the  
4 compositions; you're getting them today?"

5 A I'm getting what today?

6 Q (Continuing by MR. ALLEN): Royalties, ma'am. We just  
7 went through a number of them.

8 A Oh, some, yes.

9 Q And those royalties -- does Mr. Clinton send you  
10 royalty checks?

11 A No.

12 Q Is it his responsibility to send you royalty checks?

13 MR. QUICK: For mechanical royalties and  
14 compositions?

15 MR. ALLEN: For any royalties.

16 A Is it his responsibility?

17 Q (Continuing by MR. ALLEN): Is it his responsibility  
18 to cut you a check and send you checks for royalties?

19 MR. QUICK: Form, foundation, legal  
20 conclusion. Go ahead.

21 A If he was going to do the right thing, sure.

22 Q (Continuing by MR. ALLEN): Who has the legal  
23 responsibility to pay royalties, ma'am?

24 MR. QUICK: Same objection.

25 Q (Continuing by MR. ALLEN): If you know.

1 A From where?

2 Q From record companies, ma'am.

3 A Whoever the designate.

4 Q So do you know who the designate is on any of the  
5 tracks that you're suing him over today?

6 MR. QUICK: Same objection.

7 A Do I know who the designated person in a record  
8 company is for tracks who should be paying Bernie?

9 Q (Continuing by MR. ALLEN): Yeah.

10 A No. It changes so much, particularly through the  
11 years.

12 Q So you would admit that the record companies, either  
13 directly or through a third party organization, are  
14 charged with the legal obligation to provide you with  
15 your royalty payments, right?

16 A Not necessarily.

17 MR. QUICK: Form, foundation, legal  
18 conclusion.

19 Q (Continuing by MR. ALLEN): Then if not them, who do  
20 you believe has the legal obligation to disburse  
21 payments for royalties?

22 MR. QUICK: Which royalties?

23 MR. ALLEN: Let's go with the sound  
24 recordings.

25 A Whoever they designate.

1 Q (Continuing by MR. ALLEN): Whoever who designates?

2 A The company.

3 Q Which company?

4 A Whichever company you're referring to.

5 Q Are you talking about record companies or production  
6 companies?

7 A Is that who you're referring to?

8 Q You used the term, ma'am, so I'm asking you what you  
9 meant.

10 A Which term?

11 Q The companies. When you refer to the companies, what  
12 companies are you referring to?

13 A Any of the companies you mentioned about who pays  
14 royalties.

15 Q Okay. So that would be record companies?

16 A If they're the ones paying royalties.

17 Q That would be like a collection service like BMI,  
18 ASCAP, any of those?

19 MR. QUICK: We're just talking about sound  
20 recordings?

21 MR. ALLEN: We're talking about any  
22 royalties.

23 MR. QUICK: I think the question has been  
24 lost over time, counsel, so maybe you could recap.

25 MR. ALLEN: Yeah, it may have been because



1 we have a --

2 THE WITNESS: I have know idea what your --

3 MR. ALLEN: -- very illusive witness today.

4 MR. QUICK: All right, counsel, --

5 THE WITNESS: Don't insult me.

6 MR. QUICK: Hold on, hold on, just stop.

7 MR. ALLEN: It's beyond a pale to say that  
8 a witness is being illusive? Yeah, I don't think so.

9 MR. QUICK: Counsel, you've been raising  
10 your voice. You've been doing --

11 MR. ALLEN: No, you're raising your voice.

12 MR. QUICK: Don't interrupt me.

13 MR. ALLEN: You're raising your voice and  
14 interrupting me --

15 MR. QUICK: You're raising your voice.

16 MR. ALLEN: -- and you've been doing it all  
17 day.

18 MR. QUICK: You're interrupting. That  
19 was --

20 MR. ALLEN: I didn't do that to you  
21 yesterday.

22 MR. QUICK: -- unprofessional conduct.

23 MR. ALLEN: I didn't do that to you  
24 yesterday but I can give as good as I get. So I mean  
25 if we want to do this, we can do this or we can go to

1 the judge and we can have the judge referee. Do you  
2 want to do that?

3 MR. QUICK: Whatever you --

4 MR. ALLEN: Because I don't care that  
5 you're the state bar president, Dan. That doesn't  
6 impress me. If you think you're going to get some  
7 extra, extra --

8 THE WITNESS: It impresses me.

9 MR. ALLEN: -- leeway because you've got  
10 some kind of position, I don't, I don't, I don't view  
11 it like that. You've been obnoxious since we started  
12 today, you were obnoxious yesterday, and you've been  
13 obnoxious --

14 THE WITNESS: What was your question?

15 MR. ALLEN: -- throughout this proceeding.

16 THE WITNESS: What was your question?

17 MR. ALLEN: I've had about enough of it and  
18 I don't have to put up with it either.

19 MR. QUICK: Let's take a break. Counsel,  
20 I'll give you a choice. We can come back --

21 MR. ALLEN: You're not giving me any  
22 choice. You don't get to give choices here, okay. We  
23 are colleagues. We are equals. Don't threaten me or  
24 try to give me choices, okay. The only person that's  
25 going to give me a choice in this case wears a black

1 robe, and I answer to her, not you.

2 MR. QUICK: You will either control your  
3 behavior or we will cease the deposition and take the  
4 transcript to the judge. So let's take a break, take  
5 a breath and come back.

6 THE WITNESS: Should I leave?

7 MR. QUICK: Off the record.

8 MR. ALLEN: Off the record.

9 (WHEREUPON a short pause was  
10 had in the proceedings 12:17  
11 p.m. to 12:26 p.m.)

12 MR. QUICK: Is it all of these pages? It's  
13 like a bunch of different letters combined.

14 MR. ALLEN: I'm sorry. We're just dealing  
15 with the first two pages.

16 (WHEREUPON Exhibit Nos. 14-15  
17 were marked for identification  
18 by the reporter.)

19 Q (Continuing by MR. ALLEN): Okay. The first part of  
20 this we've marked as 14. This is a letter from the  
21 Special Master Theodore Friedman to Mr. and  
22 Mrs. Bernie and Julie -- it says Julie, sorry --  
23 Worrell. It's dated March 6, 1997. Have you had a  
24 chance to look at that?

25 A Uh-huh.

1 Q Do you recall ever receiving that letter?

2 A Yes.

3 Q He references in the third paragraph a number of  
4 grievances that you had raised with him regarding the  
5 payments that you were receiving, or that your husband  
6 was receiving at the time. And I'm trying to  
7 ascertain, if you can look at 15, I think you're --  
8 yeah, right there. Dan, do you have that?

9 MR. QUICK: Yes.

10 Q (Continuing by MR. ALLEN): I'm trying to ascertain  
11 whether the grievances that you made to Special Master  
12 Friedman, are those contained in Exhibit 15, which is  
13 dated afterwards. I mean but is this a restatement of  
14 the grievances to -- because I don't have the letter  
15 that you would have sent to Mr. Friedman that prompted  
16 his March 6 letter to you.

17 A I don't know.

18 Q Okay. Do you have any idea today what grievances you  
19 would have raised with Judge Friedman, or Special  
20 Master Friedman?

21 A No.

22 Q Were you complaining about the amount of payments you  
23 were receiving?

24 A Probably.

25 Q Okay. What else?

1 A I don't know.

2 Q Were you complaining about how they were  
3 characterizing the payments at this point?

4 A I don't know.

5 Q There's a letter from a James Weeks, CPA, that I'll  
6 have marked as Exhibit 16.

7 (WHEREUPON Exhibit No. 16  
8 was marked for identification  
9 by the reporter.)

10 Q (Continuing by MR. ALLEN): Okay. That's dated  
11 February 25th, 1997?

12 A Yes.

13 Q Do you recall seeing that?

14 A Yes.

15 Q Who is Mr. Weeks?

16 A He was our accountant then.

17 Q In 1997?

18 A Yes.

19 Q All right. And in that letter there's a discrepancy  
20 that's pointed out of approximately \$3,552.53. Do you  
21 see that?

22 A I see that.

23 Q Okay. Was there anything else that you found  
24 troubling that was in Mr. Friedman's reporting to you  
25 of the royalties that were due to you at the time?

1 A No.

2 (WHEREUPON Exhibit No. 17  
3 was marked for identification  
4 by the reporter.)

5 Q (Continuing by MR. ALLEN): Now in this letter,  
6 February 1997, which is dated -- I'm sorry, which is  
7 Exhibit 17. This is also from Purple Wood  
8 Productions.

9 A PurpleWoo Purple.

10 Q I'm sorry, PurpleWoo Productions. Is this the letter  
11 that you think Mr. Friedman was responding to in  
12 Exhibit Number 14?

13 A I don't know.

14 Q Okay. Well, in any event, whether this is what he was  
15 referring to or not, it looks like it is. He lists  
16 the February 18 -- he says February 18 but, in any  
17 event, you list a number of issues to Mr. Friedman  
18 regarding payments that you think you're owed.

19 You say here we know from firsthand  
20 experience that Bernie's name has been forged on  
21 songwriter's agreements, and it is our belief that it  
22 was done by Armen Boladian?

23 A Yeah, I don't believe that anymore.

24 Q You know that there was a court ruling a few years  
25 back in which Mr. Boladian --

- 1 A Where are you reading from?
- 2 Q I'm not.
- 3 A Oh, okay.
- 4 Q I'm asking you are you aware that there was a court
- 5 ruling a few years back in a defamation claim that
- 6 Mr. Boladian filed against Mr. Clinton in which a
- 7 court found that in fact the statements Mr. Clinton
- 8 made about forgeries was true?
- 9 A I would have no knowledge. That would be between
- 10 Armen and George.
- 11 Q Got it. So you're not aware that there's already been
- 12 a determination in a judicial proceeding that
- 13 Mr. Boladian had in fact forged agreements?
- 14 A No, I'm more concerned about the forgeries George did.
- 15 Q Okay. Well, which forgeries would that be, ma'am?
- 16 A Songwriter's agreement where Bernie's name is spelled
- 17 W-O-O-A-L-L.
- 18 Q Okay.
- 19 A For one.
- 20 Q Had you produced that songwriter's agreement in this
- 21 litigation?
- 22 A I don't know, I might have.
- 23 Q Do you have a copy of that agreement?
- 24 A I don't know, I might have. No, I don't have anything
- 25 at home now.

1 Q Okay. And if you had -- if you did have it at some  
2 point during the pendency of this litigation, you  
3 would have given it to your attorney, correct?

4 A Of course.

5 Q And what was the subject of that agreement?

6 A It was a songwriter's agreement. I don't remember  
7 what the name of the song was.

8 Q All right. And what year was it?

9 A I don't remember.

10 Q And it related to one song? I'm asking, I don't know.

11 A I'm not sure.

12 Q Okay.

13 A Hat was one song where Bernie's name was misspelled  
14 and it wasn't his signature. There was another one  
15 where it looked like somebody had taken the signature  
16 page and attached it to other songwriting agreements.  
17 Because when you use a Xerox machine, they have  
18 certain marks on them that don't go away. Those marks  
19 were on the signature page.

20 Q But not on other ones?

21 A Uh-huh.

22 Q Okay. And did you file any kind of action to  
23 challenge that forgery?

24 A It's all part and parcel of what I've been trying to  
25 get taken care of for years.



1 Q When did you discover this forgery?

2 A Oh, I don't know.

3 Q Was it before your husband died?

4 A Oh, yes.

5 Q And did you go to the police?

6 A For a forgery?

7 Q Yeah. It's a crime.

8 A No.

9 Q Didn't go to the police?

10 A No.

11 Q And you didn't file any lawsuit?

12 A Against who?

13 Q Against whomever you thought forged the signature?

14 A Not specifically for that.

15 Q Okay. Who do you believe forged the signature?

16 A I'm not sure because it could have been George, which  
17 I kind of doubt. It could have been somebody else  
18 because one day I was walking past George and he said  
19 here, here, here, I want you to sign Gary's name on  
20 this, I got to get some money out to him. And without  
21 thinking I went and signed the name -- or maybe I  
22 didn't, maybe I told him no. I don't remember but I  
23 didn't do it.

24 I remember him asking me to do it and

25 that's how I figured out that's how he did it, having

1 other people sign this, I got to get it to Bernie.

2 Q Okay. So do you have any specific evidence that my  
3 client forged your husband's signature on a song that  
4 he wrote?

5 A I don't have any specific proof, no.

6 Q Okay. So --

7 A But who else would benefit. Don't they say follow the  
8 money?

9 Q Well, I don't know who would have benefited, ma'am. I  
10 wasn't there.

11 A Well, there you go. It would have be George.

12 Q You make some state -- well, did you write this  
13 letter, February 19, '97? It has your signature on  
14 it.

15 A Yes.

16 Q Okay. Now when you make this claim at the bottom of  
17 the first paragraph that the tracks had been sampled  
18 numerous times, and you say Bernie's share would have  
19 been in the millions as he is one of the major  
20 writers. You were seeking --

21 A Where am I saying this?

22 Q This is at the bottom of the first --

23 A Oh, okay, all right, I see.

24 Q -- large paragraph, page --

25 A It's not the bottom. Second paragraph, okay.

1 Q It says again the catalog was widely sampled by too  
2 many entities to list here. Logic alone tells us that  
3 during the height of the sampling period that Bernie's  
4 share would have had to be in the millions as he was  
5 one of the major writers, right?

6 A Right.

7 Q You were seeking writers credit?

8 A I was seeking payment for the songs that were being  
9 sampled. A lot of them, because he's not a musician,  
10 a lot of those samplings were being done of the  
11 musicians and Bernie never got any money for the  
12 sampling. The sampling CD he put out, Bernie never  
13 got any money for.

14 Q So let me just ask you what do you know about the  
15 process, the actual technical process of sampling a  
16 track, have you ever done --

17 A What do you mean?

18 Q Have you ever done that yourself?

19 A No.

20 Q Have you ever overdubbed a track from one performer to  
21 another?

22 A Bernie had. I don't do music.

23 Q Okay. You don't do music?

24 A I don't do music.

25 Q Okay. So you're aware that any track that would have

1           been sampled would have already been processed first  
2           by a sound engineer, correct?

3       A     I don't know anything about the process.  Bernie would  
4           know that.  I didn't do music.

5       Q     So if the actual track that's sampled is a combination  
6           of the artist's work playing the instrument and the  
7           sound engineer mixing the sound, that sound engineer's  
8           also integral to the sample that's produced, right?

9       A     I have no idea.  I don't even know if that's true.

10      Q     All right.  So you make a statement in the next line,  
11           as I am sure you can appreciate now, there was so much  
12           subterfuge, to put it mildly, that we were waiting for  
13           the dust to settle.  What does that mean?

14      A     I don't know.

15      Q     You wrote it.

16      A     There's so many -- I wrote it back in what, 1997.

17      Q     Okay.  So what dust were you waiting to settle?

18      A     I don't remember.

19      Q     Okay.

20      A     Maybe it was the court case with Tercer, with Nene and  
21           George and everybody.

22      Q     And that's been done for 20, 30 years almost, --

23      A     Uh-huh.

24      Q     -- correct?

25                       So you would agree with me that the dust

1 from that settled by now, right?

2 A That's not what I was talking about in this letter.

3 Q Okay. And you don't recall what you were talking  
4 about in this letter?

5 A Not in 1997, no, I don't.

6 Q All right.

7 A And, besides, mostly this has nothing do with George,  
8 it has to do with Theodore Friedman and Armen  
9 Boladian.

10 Q Okay. You make a claim that Jane Peterer, in response  
11 to your request for songwriting agreements, asked --  
12 or told you to get the songwriting agreements from an  
13 attorney that you were no longer associated with. Was  
14 that Paul Schindler?

15 A I don't know.

16 Q Okay. Well, what attorneys in 1997 were you no longer  
17 associated with?

18 A I don't remember.

19 Q So at the time you were seeking these agreements from  
20 Mr. Boladian you thought he was responsible for not  
21 making payments as he should, right?

22 A That's what George had told Bernie. And it wasn't  
23 until I did some in-depth investigation that I  
24 realized Armen had had nothing to do with it. It had  
25 been our good friend George.

1 Q And what information did Mr. Boladian give you that  
2 led you to that conclusion?

3 A Nothing. I didn't talk to Armen, I told you that.

4 MR. ALLEN: Okay. Well, can you read back  
5 the last answer where she mentioned that she based her  
6 information on things that Armen gave her, please.

7 (WHEREUPON the reporter read  
8 back as follows):

9 QUESTION: "And what information did Mr. Boladian give  
10 you that led you to that conclusion?

11 ANSWER: Nothing. I didn't talk to Armen, I told  
12 you that."

13 Q (Continuing by MR. ALLEN): Okay. So if it wasn't  
14 Armen that gave you information to exonerate him, who  
15 gave you information that --

16 A I said I did further investigation. I'm not sure who  
17 I talked to. I'm not sure what I looked at. I'm not  
18 sure who sent me things. But when I saw that there  
19 were blatant forgeries, I just...

20 Q You just what, ma'am?

21 A I waited.

22 Q Okay.

23 A Because there was nothing I could do at that time.

24 Q What about seeing blatant forgeries led you to the  
25 conclusion that Mr. Boladian wasn't responsible for

1 the forgeries but my client was?

2 A Because your client had done it before.

3 Q Okay. But he had done it before, according to you,  
4 prior to 1997?

5 A I don't remember when he did it but he did it.

6 Q You weren't in communication with Mr. Clinton in the  
7 1990's about songwriter agreements, were you?

8 A I don't know. I don't remember. All I remember about  
9 songwriter agreements and George is that I asked him  
10 for copies of them and he never sent them to me.

11 Q And do you know whether he had those agreements?

12 A Well, he was -- supposedly had to assign them. They  
13 came from him.

14 Q Well, your husband would have signed agreements. Why  
15 wouldn't he have them?

16 A If George Clinton is a co-writer on a song and Bernie  
17 Worrell is a co-writer on a song, both of them have to  
18 sign the songwriter's agreement.

19 Q Okay. So --

20 A That's why I would go to George. Bernie didn't  
21 generate it, he did.

22 Q Okay. But both of them signed it and you said that  
23 because Mr. Clinton signed it --

24 A No.

25 Q -- he would have a copy of it. So your husband didn't

1 have a copy of it?

2 A That's not what I said because -- what I said was if  
3 the song was George and Bernie and they both signed  
4 it, because the song would come from George, he would  
5 have the copies -- he would have the original as well  
6 as the copies of the songwriter's agreements which  
7 Bernie never got a copy of, and that's what I was  
8 asking for.

9 Q Okay. But what led you to the conclusion that  
10 Mr. Clinton in 1997 had copies of agreements that  
11 would have had to have been signed in some instances  
12 20 years earlier?

13 A I just told you, because he was the one that was -- he  
14 was the principal.

15 Q Were you aware of the fact that -- or did you ask  
16 Mr. Clinton whether or not a tree fell through his  
17 house and wrecked his records?

18 A No.

19 Q You would agree that there are a myriad of reasons why  
20 a person would possess a document and 20 years later  
21 not possess the document, right; people move, people  
22 come in and out of areas where there's storage and  
23 take things or used in another case. You would agree  
24 with me that those are legitimate reasons why somebody  
25 would not have a copy of a document?



1 A I have no idea.

2 Q You continue on to say if Armen and Jane want to  
3 continue to say that they've advanced Bernie money,  
4 please ask them to furnish you with back and front of  
5 those cancelled checks.

6 Did you ever receive the back and front of  
7 any of those enclosed checks?

8 A I don't remember.

9 Q Okay. But at that time you believed that Mr. Boladian  
10 was shorting you money?

11 A I didn't believe it, George told Bernie that.

12 Q Okay. But you put it in words that you constructed on  
13 a letter you sent to a --

14 A And at that point --

15 Q -- court appointed special master, did you not?

16 A At that point I believed Bernie. It wasn't until I  
17 did further investigation that I realized George had  
18 lied to Bernie. So, no, I didn't believe that Armen  
19 forged it at that point.

20 Q Step by step walk me through the investigation that  
21 you did in order to determine that Mr. Clinton did  
22 something improper.

23 A I just told you.

24 MR. QUICK: Asked and answered.

25 Q (Continuing by MR. ALLEN): You told me that you don't

1 remember anything about your investigation. You don't  
2 remember whether you talked to Mr. Boladian, you don't  
3 remember --

4 A All I do remember is that I inquired of George Clinton  
5 to send me copies of the songwriter's agreements and  
6 he never did. That was my further investigation. To  
7 this day he's never sent them.

8 Q Okay. So your further -- thank you for answering my  
9 question. Your further investigation was that you  
10 asked George Clinton for the documents and he didn't  
11 provide them to you?

12 A That's right.

13 Q Okay, thank you.

14 A Songwriter's agreements specifically, not documents,  
15 songwriter's agreements.

16 Q You said if Armen and Jane want to continue to say  
17 that they've advanced Bernie money, please ask them to  
18 furnish you with the back and front of those cancelled  
19 checks.

20 Now you said that I believe you never  
21 received the cancelled checks, right?

22 A That's what I said.

23 Q Okay. Did that lead you to suspect that perhaps there  
24 wasn't cancelled checks?

25 A I don't remember. 1997 I don't remember.

1 Q Was Mr. Clinton in charge of keeping track of  
2 Mr. Boladian and Bridgeport Music's cancelled checks?

3 A No, that's why I'm confused as to why you're following  
4 this thing. It's got nothing to do with the case.

5 Q It's got a lot to do with the case, ma'am. And we'll  
6 let the judge determine whether --

7 A Okay, we can let him do that.

8 Q Okay, her.

9 A Stupid questions.

10 Q You say I can -- I'm sorry, I didn't get your, I  
11 didn't get your -- did you get that down, ma'am. I  
12 didn't hear it so can you read it back to me.

13 (WHEREUPON the reporter read  
14 back the question as follows):

15 ANSWER: "Stupid questions."

16 Q (Continuing by MR. ALLEN): Okay, thank you.

17 You then go onto say I can tell you now  
18 that Bernie never received any advances; although when  
19 sending checks to Bernie, Armen would routinely write  
20 on the lower left hand corner advance against  
21 royalties, and we would just routinely and justifiably  
22 reject that claim.

23 Why would you reject a check that came to  
24 you that said advance against royalties?

25 A Because they were not advances against royalties.

1           They were payments for other things.

2       Q     Like what?

3       A     I don't know way back then.

4       Q     Was it for his services as a musician?

5       A     Could have been.

6       Q     His services as a producer?

7       A     No, because George never credited Bernie for all the  
8           production he did.

9       Q     Okay. Was it --

10      A     Nor paid him.

11      Q     -- for services playing his keyboard?

12      A     Again I do not remember.

13      Q     Okay. You go onto state the fact of the matter,  
14           Mr. Friedman, is that my husband never received any  
15           statements until Tercer Mundo filed the lawsuit.

16                   Do you believe that to be true today?

17      A     Yes.

18      Q     And Tercer Mundo is what?

19      A     That was Nene Montez company.

20                   COURT REPORTER: I'm sorry, whose company?

21                   THE WITNESS: Nene Montez, M-O-N-T-E-Z.

22           And Nene is N-E-N-E.

23                   MR. ALLEN: And Tercer is T-E-R-C-E-R.

24      Q     (Continuing by MR. ALLEN): You say we knew that we  
25           didn't have the money -- we knew that we didn't have

1 the money for an audit, they knew it too. Who is the  
2 they you're referring to, Nene or Armen or both?

3 A I don't remember. Everybody actually. We didn't have  
4 any money. It had been taken away.

5 Q And you say it's easy to say why didn't we have an  
6 audit done when Armen knew darn well what our  
7 circumstances were.

8 What did you mean by that?

9 A That we didn't have any money and that I had to keep  
10 asking them for advances.

11 Q You --

12 A Bernie was taken -- sorry, go ahead.

13 Q You had to ask Armen for advances?

14 A That's the only place we ever got any money.

15 Q All right. The next sentence, referring to the audit  
16 that you did do, we found one person back in the  
17 1970's.

18 Now when you say you found one person, I  
19 mean did you look for others and you only found one  
20 that was willing to do the audit?

21 A No, it's, it's -- yeah, I see it. We found one person  
22 and that's Ira Herzog.

23 Q Okay. So you found Ira Herzog. I'm just trying to  
24 ascertain, and I don't know this, that's why I'm  
25 asking, was he the only one that you were able to find

1 to do the audit?

2 A I didn't ask for anybody else. He was highly  
3 recommended.

4 Q Okay, all right. You say that the audit showed that  
5 way back that monies had been diverted from my  
6 husband.

7 Okay. Where were they diverted?

8 A They never came to Bernie. I don't know where they  
9 went.

10 Q But to follow-up such an audit with the litigation  
11 necessary to secure payment was not financially  
12 possible for us. But you did file a lawsuit, correct?

13 A We tried.

14 Q Based on the audit?

15 A To an extent, yeah.

16 Q Well, I mean you stated that the Verified Complaint  
17 had your husband's signature on it --

18 A Right.

19 Q -- from 1981?

20 A Oh, right, that never -- yeah, right.

21 Q And you settled that lawsuit eventually, correct?

22 A I don't think so. I don't remember.

23 Q You received a payment?

24 A I don't remember.

25 Q Okay. You don't remember because it didn't happen, or

1           you don't remember because it was 50 -- almost 40 some  
2           years ago?

3       A     I don't remember.

4       Q     Okay. If there was evidence to show that you did  
5           receive a payment on that case, the 198 -- I always  
6           get mixed up whether it was '81 or '82, my apologies.  
7           I believe it's Exhibit Number 2 if I'm not mistaken,  
8           yes.

9       A     I'm sorry, what? I thought he was looking for  
10          something.

11      Q     I was.

12                               (WHEREUPON the reporter read  
13                               back the question as follows):

14      QUESTION: "If there was evidence to show that you did  
15                  receive a payment on that case, the 198 --  
16                  I always get mixed up whether it was '81 or  
17                  '82, my apologies. I believe it's Exhibit  
18                  Number 2 if I'm not mistaken, yes."

19      Q     (Continuing by MR. ALLEN): You don't have any  
20          evidence today to dispute that, correct?

21      A     To dispute what?

22      Q     If there is evidence of a check being paid to you in  
23          settlement of that lawsuit, not you but your husband,  
24          you don't have any -- you wouldn't have any reason to  
25          dispute, if I were to provide you with the check, that

1 the case was in fact settled for a sum certain, right?

2 MR. QUICK: Form and foundation.

3 THE WITNESS: Do I answer?

4 MR. QUICK: If you possibly can.

5 THE WITNESS: Oh, that's a hypothetical.

6 He's asking me if -- I mean I would have to see the

7 back and front of that check.

8 Q (Continuing by MR. ALLEN): Assuming that --

9 A And, no, I don't remember anything like that.

10 Q Okay. You state in the middle paragraph of page two,  
11 Armen had and has the benefit of our money to hire  
12 lawyers to keep us from getting our money. Can you  
13 understand my frustration when you called.

14 Did you write that?

15 A Yes.

16 Q So you were expressing frustration that Mr. Boladian  
17 was using his economic advantage over you to prevent  
18 you from getting what you thought he owed you,  
19 correct?

20 A This was based on Bernie telling me --

21 Q Ma'am, it's a yes or no question.

22 A No, it's not.

23 Q It's a very simple question.

24 A All right, ask the question again.

25 Q It's not a trick question.



1 A I don't think I can.

2 Q It's not a trick question.

3 A I'm not worried about your questions. Ask the  
4 question again. Maybe I misunderstood you.

5 MR. ALLEN: Go ahead.

6 (WHEREUPON the reporter read  
7 back the question as follows):

8 QUESTION: "So you were expressing frustration that  
9 Mr. Boladian was using his economic  
10 advantage over you to prevent you from  
11 getting what you thought he owed you,  
12 correct?"

13 A Yes, at that time, yes.

14 Q (Continuing by MR. ALLEN): Thank you. I don't  
15 suppose you remember sending the e-mail or the article  
16 that's referenced in the third paragraph here that  
17 says regarding the letter and forwarded e-mail from  
18 Jane Peterer that you enclosed with your e-mail to me,  
19 first of all, what is her purpose in sending that to  
20 you; do you recall the letter that Jane Peterer --

21 A No.

22 Q Okay. And, secondly, she has inserted an article that  
23 appeared in a newspaper somewhere in California that I  
24 had copied to some e-mail I was sending out.

25 I take it because you don't remember Jane

1 Peterer's e-mail you don't remember what article you  
2 were referring to here?

3 A No.

4 Q All right. So I thought you were not to be involved  
5 in the rest of the shenanigans. Did she tell you that  
6 Armen booted Clinton off the ranch.

7 What's that refer to?

8 A I don't know.

9 Q Okay. Do you recall that Mr. Boladian attempted to  
10 evict Mr. Clinton from his home in Brooklyn, Michigan?

11 A No, I didn't pay any attention what was going on with  
12 George.

13 Q So you didn't know whether he had any money at all at  
14 that time, do you?

15 A Of course he did.

16 MR. QUICK: I'm sorry, who, Mr. Clinton?

17 MR. ALLEN: Mr. Clinton.

18 Q (Continuing by MR. ALLEN): Of course he did?

19 A Of course he did.

20 Q What did you do to ascertain whether Mr. Clinton had a  
21 dollar to his name in 1997?

22 A Looked to see whether or not he was on tour.

23 Q Okay. And you know what he received for being on  
24 tour?

25 A No. I know Bernie didn't receive anything.

1 Q Okay. So you don't know whether Mr. Clinton received  
2 anything?

3 A Not my business.

4 Q All right. And, lastly, why did you send that on to  
5 me.

6 Are you referring to the special master  
7 report that we've already had marked in this case that  
8 is Exhibit 13?

9 A I don't know.

10 Q That reminds me, I haven't any intention of sending  
11 anything to any attorney for Boladian/Peterer.

12 What was it that you -- what was it that  
13 somebody wanted you to send, if you recall, --

14 A I don't know.

15 Q -- to Mr. Boladian or Ms. Peterer?

16 A I don't know.

17 Q Okay. While I am not completely naive it is still  
18 incomprehensible to me that they can continue to  
19 represent an individual who has been proven guilty of  
20 forgery, and whose ill-gotten gains were obtained by  
21 false dealings with my husband/client.

22 Do you see that?

23 A I see that.

24 Q Okay. Did you write that?

25 A We've already determined that I wrote this letter so

1 the answer is yes.

2 Q And you say that you're going to deal with Ms. Peterer  
3 in another forum in not too distant future.

4 Can I assume that you didn't deal with  
5 Ms. Peterer in the not too distance future from the  
6 writing of this letter?

7 A Yes, I did.

8 Q What did you do to deal with Ms. Peterer?

9 A I spoke to her.

10 Q And what did you say to her?

11 A We were talking about everything that was going on.  
12 Talked about her husband who was a member of --  
13 co-founded of Core, and that meant she was going back  
14 to Switzerland. And she invited me to come visit her  
15 when I could, that kind of thing.

16 Q So at the time you lacked the resources to hire an  
17 attorney to pursue money that at the time you thought  
18 Mr. Boladian owed you. And were you sending this  
19 letter to Mr. Friedman to set the record straight on  
20 what your husband was owed --

21 A Yes.

22 Q -- for his -- okay.

23 A To which -- oh...

24 Q We definitely disagree with Bridgeport Music's  
25 statement and have for years, but what I don't

1 understand is why we have to agree with them to  
2 receive whatever piddling sum they have decided to  
3 send us this time. So Bridgeport was sending you  
4 piddling sums at that time, correct?

5 A Bridgeport was sending us statements and money.

6 Q And I can look up the definition of piddling, but I  
7 believe it is similar to paltry or inadequate or --

8 A Not enough.

9 Q Not enough.

10 A But still more than your client ever sent.

11 MR. QUICK: All right, let's just --

12 THE WITNESS: No, all right.

13 MR. QUICK: -- answer the questions if you  
14 can.

15 THE WITNESS: Okay.

16 Q (Continuing by MR. ALLEN): Now on that subject, how  
17 much information do you have today about what  
18 Mr. Boladian was paying my client?

19 A I have no idea.

20 Q Okay.

21 A That's not my business.

22 Q Did you talk to other members of the band in which  
23 they --

24 A Never.

25 Q -- were not receiving money from Mr. Boladian?

1 A Never.

2 Q Is it your belief today that Mr. Boladian was treating  
3 other members of the band, including my client,  
4 similar to your husband?

5 A No, I have no knowledge of that.

6 Q Okay. We have every intention of getting to the  
7 bottom of this but in order to do this we need  
8 whatever monies we can manage to get from them.

9 Okay. What did you think -- what monies  
10 did you think you were entitled to that you didn't  
11 receive from Mr. Boladian, for what?

12 A I don't know.

13 Q Okay. Now this is copied to Samuel Kramer. Who's  
14 Samuel Kramer?

15 A I'm not sure.

16 Q Was he one of your attorneys?

17 A He might have been, or he might have been somebody who  
18 wanted to be one of our attorneys. I don't know.

19 Q What about James Weeks?

20 A I told you, accountant.

21 Q I'm sorry, a lot of names here, I forgot.

22 Okay. So you knew when you sent this to  
23 Theodore Friedman that it was important for you to be  
24 complete in your characterization of the monies that  
25 you felt were owed to your husband for the work he did

1 with Mr. Clinton, correct?

2 MR. QUICK: Objection, form.

3 A That, that had nothing to do with George. That had  
4 only to do with Armen.

5 Q Ma'am, ma'am, I didn't ask you that question. The  
6 question I asked was did you know that it was  
7 important for you to be complete in setting forth your  
8 complaints about the money that you were receiving or  
9 not receiving from Mr. Boladian at the time?

10 A You --

11 MR. QUICK: You said Mr. Clinton the first  
12 time you asked the question.

13 MR. ALLEN: I'm sorry, very sorry, I --  
14 mental block. My apologies, counsel.

15 A Of course I thought it was important, otherwise I  
16 wouldn't have written a letter.

17 Q (Continuing by MR. ALLEN): Okay. And you did your  
18 very best to set forth your -- what you thought were  
19 your claim to additional monies to Mr. Friedman,  
20 right?

21 A That's what the letter says.

22 Q Okay. Did you leave any category of money that you  
23 thought your husband was entitled to out of this  
24 letter?

25 MR. QUICK: From Mr. Boladian?

1 MR. ALLEN: From anyone.

2 A To the best of my knowledge.

3 Q (Continuing by MR. ALLEN): Okay. We're turning back  
4 to Mr. Friedman's response of March 6, 1997. And it  
5 states that there's a letter that's being transmitted  
6 for \$2,682.62. It was sent on I believe the same day  
7 that you wrote your letter, yes. And he assumes that  
8 basically your letter and that check crossed in the  
9 mail.

10 He says as you already know, and as Judge  
11 Real told you in court in Los Angeles, songwriters  
12 such as yourselves are not parties to this litigation.

13 Do you recall him -- do you recall Judge  
14 Real telling the songwriters that --

15 A I recall him telling me that.

16 Q Okay. I do not represent you or them in the  
17 grievances against either Bridgeport, Tercer or  
18 Boladian, however valid or invalid they may be.

19 You knew that Mr. Friedman wasn't  
20 representing you in that case, right?

21 A When he wrote me that, yes, I did.

22 Q Okay. The most I can do is use my best office to have  
23 those entities send you the statements and documents  
24 you seek, and to make payments provided there is  
25 agreement; otherwise I must hold the money in escrow



1 pending the outcome of the litigation.

2 Okay. First question about that is did  
3 Mr. Friedman do as he promised, and send you the  
4 statements and documents that you were seeking to  
5 substantiate or not the claims you were making in the  
6 letter?

7 A Can I see that a minute?

8 Q Yeah, sure. Second paragraph.

9 A He was going to -- I can -- the most I can do is use  
10 my best office to have those entities send you the  
11 statements and documents you seek.

12 There were a variety of entities and I  
13 don't remember who they were.

14 Q So my question to you was do you recall whether he  
15 honored his promise to get them to send you the  
16 documents that you seek?

17 A I have no way of knowing because if he asked them to  
18 do it and they didn't do it, how would I know that.

19 Q Well, but you would know if you remembered if you  
20 received that information subsequent to this letter.

21 A Oh, I would remember that, yes, and I did not.

22 Q Okay. So you don't believe that, regardless of what  
23 Mr. Friedman may or may not have done, you don't  
24 believe that you ever received the promised statements  
25 that Mr. Friedman is referencing here?

1 A I don't think so.

2 Q Okay. And do you recall whether you were ever  
3 disbursed any of the money held in escrow by  
4 Mr. Friedman at the conclusion of the case between  
5 Tercer Mundo and Boladian and Bridgeport Music?

6 A I think so because Armen released the money to us.  
7 That I know.

8 Q All right. And were you satisfied with the release of  
9 the funds?

10 A Yes, yes. Armen was very nice.

11 Q So you believed at the conclusion of this litigation  
12 that you had received what you were entitled to  
13 receive from Mr. Boladian?

14 A Yes.

15 Q Okay. So Mr. Friedman did say in the letter that he  
16 was copying Ms. Peterer and Bridgeport's attorney --  
17 Bridgeport, Boladian's attorneys to send copies of the  
18 cancelled checks showing the past asserted advances.

19 And it's your testimony that you never got  
20 that information?

21 A I don't remember.

22 Q Okay. You don't remember that that was your testimony  
23 or you don't remember whether you got the information?

24 A I don't remember if I got the information.

25 Q It's possible that you did, you just don't remember?

1 A I don't remember.

2 Q Okay.

3 A It's possible I didn't.

4 Q It's possible that you didn't, it's possible that you  
5 did and you just forgot because it's been --

6 A I don't remember.

7 Q -- 30 years?

8 A I don't remember.

9 Q I'm trying to ascertain what it is that you don't  
10 remember, ma'am. Is it that you don't remember the  
11 answer to the question you just gave a few minutes  
12 ago, or is it that you don't remember whether you  
13 received the documents or not?

14 A Both.

15 Q Okay. Is there anything that would refresh your  
16 recollection as to whether or not you received those  
17 documents?

18 A Seeing the back and front of the cancelled check,  
19 seeing the documents.

20 Q Is it your position in this case that the failure of a  
21 third party, Bridgeport Music, to provide you with  
22 cancelled checks is something that should be imputed  
23 to my client?

24 A No.

25 Q Okay. Take a look at that.

1 A Are you speaking to me?

2 Q Yeah.

3 A Which one?

4 Q Fifteen, ma'am.

5 A Okay.

6 Q Okay. We've established that Mr. Weeks is an  
7 accountant, correct?

8 A Yes.

9 Q And Mr. Kramer you don't -- I think it was  
10 Mr. Kramer --

11 A I remember Sam but I'm not sure he was our attorney.  
12 He may have been somebody that I was hoping to be an  
13 attorney.

14 Q Got it, okay. And George Gilbert?

15 A He was an attorney.

16 Q Okay. Whose attorney?

17 A Bernie's.

18 Q Okay. Was he a good attorney?

19 A I don't hire anything but good attorneys.

20 Q Okay.

21 MR. QUICK: Thanks.

22 Q (Continuing by MR. ALLEN): Did he have any input in  
23 helping you draft this Exhibit 15, the March 7, --

24 A No.

25 Q -- 1997 document?

1 A No.

2 Q Was it your experience that if you left something  
3 important out of a communication of this sort, that  
4 Mr. Gilbert would say you need to add this, or would  
5 he send a communication behind this to say that  
6 there's missing information?

7 A That's not how it was done.

8 Q How was it done then?

9 A Certain lawyers I would tell them what I was going to  
10 do. They'd say, well, you're intelligent and  
11 articulate, go ahead and do it. Read it to me first  
12 before you send it. And that's what I would do.

13 Q Okay. And was he one of those lawyers?

14 A Yes.

15 Q And do you think sitting here today that you would  
16 have reviewed the exhibit that we've had marked and  
17 just gone through that is 17 and 15?

18 A That he would have approved it?

19 Q That he would have read it and said this is good, this  
20 is not good?

21 A Fine, yeah, otherwise I wouldn't have done it.

22 Q Okay. So you take issue with a check coming from a  
23 Della Maria's office and not yours. Who's Della  
24 Maria, was that Mr. Boladian's lawyer?

25 A I think so.

1 Q And you say the promise, obvious we are shorted money  
2 again, right?

3 A That's what I wrote.

4 Q Did you provide any sort of calculation as to what  
5 constituted the shortfall in money?

6 A No.

7 Q Sitting here today do you recall what shortfall you  
8 were referencing here?

9 A No, it says it right on the thing. We was short two  
10 thousand some dollars. Where's it say that?

11 Q I believe -- it's not in this communication.

12 A It's in this one. The correct contract summary from  
13 Bridgeport indicates total royalties of two thousand  
14 blah, blah, blah. Please explain the difference of  
15 3,552.23.

16 Q Right, right. That's Exhibit 16. So the shortfall of  
17 what you just said, 2,000 -- the shortfall of I think  
18 it's 3,552.53, right?

19 A Whatever's written.

20 Q What was causing the shortfall; what were they not  
21 paying you for?

22 A I have no idea.

23 Q Okay. Do you recall whether you ever received the  
24 shortfall?

25 A No, but we probably did because there was no more

1 correspondence involved.

2 Q Okay.

3 MR. ALLEN: I want to take a quick break  
4 and just check to see you've got everything here, 30  
5 second break. 'Cause I've got a stray page three of  
6 one of the documents, I want to make sure it I'm not  
7 it would have been the February 18th.

8 THE WITNESS: While he's doing that I got  
9 to go to the bathroom.

10 MR. ALLEN: Off the record at 1:20.

11 (WHEREUPON a short pause was  
12 had in the proceedings 1:20  
13 p.m. to 1:26 p.m.)

14 MR. ALLEN: Back on.

15 (WHEREUPON Exhibit No. 18  
16 was marked for identification  
17 by the reporter.)

18 Q (Continuing by MR. ALLEN): Ready, everybody, all  
19 right.

20 Ma'am, I've handed you what's been marked  
21 as Exhibit 18. Have you had a chance to look at it?

22 A Yes.

23 Q And have you read it?

24 A Yes.

25 Q Are you familiar with it?

1 A No.

2 Q Have you ever seen it before?

3 A No.

4 Q Well, I just have a couple of questions for you. They  
5 don't require that you previously read it.

6 Footnote eight, that's on page two.

7 A Okay.

8 Q There's reference made to a personal guarantee that my  
9 client, George Clinton, signed guaranteeing that the  
10 debt that is referenced in the earlier paragraphs of  
11 the document. Just a simple question. Did  
12 Mr. Worrell ever personally guarantee a debt of --

13 A No.

14 Q -- any --

15 A No.

16 Q -- entity that Mr. Clinton was involved with?

17 MR. QUICK: Just let him get his question  
18 out before you give your answer so our court --

19 THE WITNESS: Okay.

20 MR. QUICK: -- reporter can take it down,  
21 okay?

22 THE WITNESS: All right, I'm sorry.

23 Q (Continuing by MR. ALLEN): Are you aware of your  
24 husband ever personally guaranteeing any debt other  
25 than household debt between you and he?



1 A No.

2 Q If he had, you would have known about it, right?

3 A Yes.

4 Q Who is Amor Montez?

5 A Nene's daughter.

6 Q And who is Nene?

7 A From my opinion or what we were told?

8 Q I'd like, to the extent you can give it to me, the

9 truth. I mean who is he?

10 A The first time I became aware of Nene he was working

11 with George.

12 Q And what was he doing for Mr. Clinton?

13 A I have no idea.

14 Q And what were your interactions with Nene Montez?

15 A In the beginning, none.

16 Q Okay. And did that change at some point?

17 A Yes.

18 Q How did it change?

19 A When Bootsy came to me and asked me to listen to Nene

20 regarding the songwriter agreements and everything

21 that later became the lawsuit against Armen.

22 Q And what year was that?

23 A I don't know.

24 Q Was it prior to the turn of the century, this century?

25 A I think so.

1 Q And what were the nature of those conversations?

2 A With who?

3 Q With, well, Mr. Montez.

4 A Are you asking me when Bootsy asked me to talk to  
5 Nene, what was the content?

6 Q Yes. I'm referring to what you just testified to.

7 A Okay. Nene wanted Bernie to be involved in the  
8 lawsuit. And I asked him if I ask Bernie to do it and  
9 he agreed, would he return Bernie's publishing to him;  
10 because I had asked George if he would do it and he  
11 said no.

12 He said I can only return -- I can't return  
13 the money that he's been due but I will return his  
14 publishing to him. And at that point I talked to  
15 Bernie and he agreed to become part of that lawsuit.

16 Q Okay. Which lawsuit?

17 A The one that Tercer Mundo filed against I think it was  
18 Armen.

19 Q Okay.

20 A You've got the papers in there somewhere.

21 Q We've gone through that --

22 A Uh-huh.

23 Q -- lawsuit, --

24 A That's it, uh-huh.

25 Q -- correct?

1                   So your husband's involvement in that  
2                   lawsuit emanated from a conversation that began with  
3                   Bootsy Collins approaching you and asking you to speak  
4                   with Mr. Montez?

5       A       To listen to what Nene had to say.

6       Q       Okay. And eventually your husband joined Mr. Montez  
7                   in that lawsuit, correct?

8       A       Yes.

9       Q       All right. And in that lawsuit you were suing  
10                  Mr. Boladian for what?

11      A       I'm not sure.

12      Q       Did you assert any claims against Mr. Clinton in that  
13                  lawsuit?

14      A       Excuse me?

15      Q       Did you assert any claims against Mr. Clinton in that  
16                  lawsuit; was he a party in that lawsuit?

17      A       I don't think so. I don't know.

18      Q       So at that time you weren't pursuing Mr. Clinton for  
19                  anything that you claim your husband was owed,  
20                  correct?

21      A       Not that I remember.

22                                   (WHEREUPON Exhibit No. 19  
23                                   was marked for identification  
24                                   by the reporter.)

25      Q       (Continuing by MR. ALLEN): Have you had a chance to

1 look at that?

2 A Yes.

3 Q Exhibit 19 purports to show payments made from Thang  
4 to your husband. And as I understand your --

5 MR. QUICK: I'm just going to quibble with  
6 your characterization of the exhibit because there's a  
7 lot of different pieces of paper in here and they're  
8 all not related to Thang.

9 Q (Continuing by MR. ALLEN): I'm sorry. First page,  
10 simple question. You see that there are a number of  
11 payments that are listed on a ledger that say at the  
12 top of the ledger Bernie Worrell payments from Thang.  
13 Do you see that there?

14 A I see that.

15 Q Okay. Assuming your testimony is going to be that  
16 notwithstanding what's in here, you don't know whether  
17 those -- or you don't recall whether those payments  
18 were received?

19 A I do not.

20 Q Do you have any evidence to demonstrate that the  
21 payments were not received?

22 MR. QUICK: Objection, form.

23 A How can I prove a negative? Do they have any proof  
24 that they paid it?

25 Q (Continuing by MR. ALLEN): Ma'am, I'm asking you

1 questions here and it's a simple yes or no question.

2 Do you have any evidence --

3 A No.

4 Q Okay, thank you. Same question with respect to the  
5 second page of that exhibit, which appears to show  
6 deposits to Bezerk Music, Bernie Worrell deposits,  
7 Bezerk Music. I can't read that word next to deposits  
8 up at the top.

9 MR. QUICK: Do you know what the question  
10 is?

11 THE WITNESS: No.

12 Q (Continuing by MR. ALLEN): I'm saying can you read  
13 any better than I can or make out what the second word  
14 is on the second line underneath Bernie Worrell? It  
15 says deposits and then it looks like B-E-Z-E-R-K, if  
16 I'm reading it correctly. I'm asking whether you have  
17 any insight as to what that word might be?

18 A Yeah, it looks to me like B-E-Z-U-H or K. So, no, I  
19 don't.

20 Q Okay. And you don't have any idea what that entity  
21 is?

22 A No.

23 Q All right. Now do you dispute that even the payments  
24 that are reflected on this ledger, this second page of  
25 the exhibit, were made to your husband?

1 A I don't know.

2 Q The third page, you see there are a number of tracks  
3 that are listed here?

4 A Yes.

5 Q And then there's an amount that was received for the  
6 track times the percentage of your husband's interest,  
7 and that produces a column royalty earnings on the  
8 side. Do you see that?

9 A I see that.

10 Q Do you dispute that the payments that are reflected on  
11 this page of the exhibit were made?

12 A I have no idea.

13 Q Same question for the next page?

14 A Same answer.

15 Q Same question for the third page?

16 A Same answer.

17 Q Same question for the fourth page?

18 A Same answer.

19 Q Same question for the fifth page?

20 A Same answer.

21 Q Okay. The sixth page I believe starts different font  
22 and type, different type of a report. It's from a  
23 company called Segel and Goldman, Inc. of 9200 Sunset  
24 Towers and it's for a period ending 6-30-75. Do you  
25 see that?

1 A I see that.

2 MR. QUICK: I don't know that that's '75  
3 but...

4 MR. ALLEN: Oh, you're right, Dan. I did  
5 see that earlier, it's 79. You're correct.

6 MR. QUICK: Can I just ask a question too,  
7 counsel?

8 MR. ALLEN: Sure.

9 MR. QUICK: The last two pages you went  
10 through, they don't have Bates numbers on them. Were  
11 they produced?

12 MR. ALLEN: I believe so, Dan.

13 Audrey, please make a note to double check  
14 that, thank you.

15 Q (Continuing by MR. ALLEN): Okay. I'm sorry if I got  
16 an answer to this question, but do you recall who  
17 Segel and Goldman were?

18 A No.

19 Q Okay. Do you have any reason to dispute that the  
20 payments that are reflected on this royalty statement,  
21 which is two pages it looks like, are incorrect?

22 A I don't know. I have no way of knowing.

23 Q Okay. And do you recall whether you received those  
24 payments?

25 A I don't know.

1 Q Turning to the next page, there is a Western Union  
2 Money Order receipt.

3 A Oh.

4 Q Appears to show a wire transfer from Thang, Inc. to  
5 Bernard or Judie Worrell in Plainfield, New Jersey.

6 A Okay.

7 Q Do you recall receiving that payment from Thang, Inc.?

8 A No, I don't.

9 Q Do you have any reason to dispute whether that payment  
10 was in fact made?

11 A No.

12 Q Next page there are a number of receipts. Do you  
13 recognize -- let's go one by one just so we're clear.

14 In the top left hand corner there's a  
15 receipt dated 5-5-79. Does that have your husband's  
16 signature on it for \$150?

17 A Yes, it does.

18 Q Okay. What about the next one, upper right hand  
19 corner?

20 A But it says for royalties so that's not right. The  
21 upper what?

22 Q The upper right hand corner it says -- well, it's  
23 partially cut off, but it looks like there was a  
24 payment of some amount, the last two digits \$50, July  
25 3rd, 1979 for travel?



1 A Yes.

2 Q All right. And in the bottom left hand corner is that  
3 your husband's signature there, 5-6-77?

4 A Yes.

5 Q Okay, session advance. And then there's one it's just  
6 2-23. There's no year associated with it.

7 A Where are we, same page?

8 Q Same page.

9 A That's Bernie's signature.

10 Q All right. Was he in the habit of signing for  
11 receipts for money that he didn't receive?

12 A Of course not.

13 Q Okay. There's another royalty statement that's on the  
14 next page, again from Segel and Goldman. Do you have  
15 any recollection of receiving the payments that are  
16 reflected on this royalty statement?

17 A No.

18 Q Do you have any reason to dispute whether the royalty  
19 statement -- or whether the payments that are  
20 reflected on this royalty statement were in fact  
21 received?

22 A I have --

23 MR. QUICK: I'll object as to form as to  
24 the word payments. Go ahead.

25 A I have no idea.

1 Q (Continuing by MR. ALLEN): The next page, again  
2 another series of receipts. I just want to ask you  
3 one question about all of them. Are all of these  
4 signatures from your husband?

5 A What page -- oh.

6 Q The next page.

7 A The top one is, the one underneath it is, the one  
8 underneath that is and the one over here on the side  
9 is.

10 Q And just for purposes of the record we're talking  
11 about Bates number GCThang0247. The prior pages that  
12 we were referring to were all in sequence up to 247.

13 Bates number 248, the next page, there's a  
14 payment of \$2,000, to looks like Bernard Worrell,  
15 \$2,000, and I don't see a date on it. Do you have any  
16 reason to dispute that that payment was received by  
17 your husband?

18 A I don't know. I can't even read what it says the  
19 sender's name is.

20 Q Fair enough. When was the last time you had any  
21 conversation with Amor Montez?

22 A Amor?

23 Q Yeah.

24 A Around '16.

25 Q Okay.

1 A She came to see Bernie.

2 Q Okay. And you've had no discussions with Amor Montez  
3 since then?

4 A No.

5 Q How about Nene Montez?

6 A He's dead.

7 Q When was the last time you had a conversation with him  
8 prior to his death?

9 A When he flew me to Florida because he wanted to give  
10 me four albums he was getting back from Priority. And  
11 he asked me would you make sure that all the people in  
12 the group got paid and I said definitely. And then I  
13 didn't hear from him again.

14 Q Okay. So how is it that you were going to make sure  
15 that the members of the group got paid?

16 A Because he trusted me.

17 Q So he gave you four albums?

18 A He did not give them to me.

19 Q Okay.

20 A He was asked -- go ahead, I'm sorry.

21 Q Go ahead, finish what you were going to say. He was  
22 asking you what?

23 A He was talking about these four albums and asking me  
24 would I make sure that everybody got paid; in other  
25 words, that Bernie wouldn't just be the only one, and

1 I said of course.

2 Q So what albums were they?

3 A I don't know. There were four albums. I think  
4 Priority Records had them. I'm not exactly sure.

5 Q They weren't any other albums other than Priority  
6 Records albums?

7 A I never saw the albums. I'm assuming from what he  
8 said that he was getting them back from Priority.

9 Q So did he tell you how he expected you to ensure that  
10 they were going to get paid or --

11 A No, he trusted me.

12 Q He gave you the money in order --

13 A He didn't give me anything. It was a conversation.

14 Q So he wanted you to check with the other members of  
15 the band --

16 A No.

17 Q -- to find out -- okay, well, I don't understand what  
18 it is that -- you said he wanted to make sure the  
19 other members of the band got paid. How were you  
20 going to do that?

21 A Well, again we were having a conversation and I told  
22 him, yes, I would. He didn't ask me how I was going  
23 to do it, and I didn't give too much thought to it  
24 because it was again a hypothetical conversation.  
25 Until it happened I was making no move.

1 Q Okay. Did you ever pay anybody anything for these  
2 four albums yourself?

3 A I never got the albums.

4 Q Okay. Did Mr. Montez ever pay people for these four  
5 albums?

6 A I have no idea.

7 Q And you never saw the albums. What musicians played  
8 on the albums?

9 A I never saw the albums so I don't know which musicians  
10 played on them. I know Bernie was on it.

11 Q What I'm struggling with, ma'am, is he had an  
12 expectation that you were going to see that these  
13 members got paid, and that implies that you knew what  
14 band members were on the albums. So I'm trying to  
15 discern how you were supposed to ensure that they got  
16 paid?

17 A I don't know. It was a conversation. I never got the  
18 albums, I don't know who it was on it. I know Bernie  
19 was on them, but it never went any further than.

20 Q And you don't know whether the albums had anything to  
21 do with Parliament-Funkadelic or any --

22 A I had no idea.

23 Q -- group associated with Mr. Clinton?

24 A Oh, yeah, they were all related to Clinton some kind  
25 of way.

- 1 Q Okay.
- 2 A He would know.
- 3 Q So how long did this conversation last?
- 4 A Between Nene and me?
- 5 Q Uh-huh.
- 6 A Twenty minutes.
- 7 Q Okay. So he flew you to -- he paid to fly you to
- 8 Florida --
- 9 A Yes.
- 10 Q -- in order to have a 20 minute conversation with you?
- 11 A Uh-huh, and to talk to Maria.
- 12 Q Who's Maria?
- 13 A His wife.
- 14 Q And so what did you and Maria speak about?
- 15 A Her colon cancer and certain private matters between
- 16 her and Nene. It was a woman-to-woman discussion,
- 17 nothing to do with business.
- 18 Q So it didn't have anything to do with Mr. Clinton?
- 19 A No.
- 20 Q What else did Mr. Montez have you -- or discuss with
- 21 you during your 20 minute conversation with him?
- 22 A Nothing.
- 23 Q Did you stay with the Montezes?
- 24 A No. I turned around that evening and came home.
- 25 Q Okay. So was the purpose of the visit to comfort his

1 wife or was the purpose of --

2 A Partially.

3 Q Okay. Was there anything about the conversation that  
4 you had with him pertaining to these four albums that  
5 required your physical presence in Florida with him?

6 A Only that I think he preferred to do it face-to-face,  
7 eye-to-eye.

8 Q Okay. What gives you the idea that he preferred to do  
9 things face-to-face versus eye-to-eye?

10 A With me he did. I don't know what he did with anybody  
11 else.

12 Q Did he ever fly you to his -- anywhere where he was at  
13 before in order to have a conversation with you or was  
14 this the only time?

15 A I only ever had two real conversations with Nene. One  
16 was the one I already described when Bootsy wanted us  
17 to talk, and this was the second. Nene and I were not  
18 friends.

19 Q Do you consider yourself a friend of his daughter  
20 Amor?

21 A Yes.

22 Q And you have not had a conversation with her in eight  
23 years?

24 A No, I didn't say that. Well, actually, yes, because  
25 she came up when Bernie was dying and that was the

1 last time I saw her. I think only one other time she  
2 called me and just to chit-chat and that's it.

3 Q And when did that conversation occur?

4 A Oh, within -- a couple years after she first came up.

5 Q So within -- sometime in the period between 2016 and  
6 2018?

7 A Yes.

8 Q To the best of your recollection?

9 A Yes.

10 Q Did you ever discuss the lawsuit that you filed in New  
11 York with Amor against -- or the estate, I'm sorry,  
12 did you ever discuss the lawsuit that the estate filed  
13 in New York State against Mr. Clinton in 2019?

14 MR. QUICK: With her?

15 THE WITNESS: With Amor?

16 MR. ALLEN: With Amor.

17 MR. QUICK: Yeah.

18 A I might have 'cause she was trying to do some -- I  
19 might have.

20 Q (Continuing by MR. ALLEN): She was trying to do what,  
21 ma'am?

22 A She was trying to contact George about some tapes that  
23 Nene had left behind when he was recording the group  
24 near the United Nations, and she wanted to get with  
25 George to release it but he never responded to her.



1           So she was asking me to help and I said I'm not the  
2           person to get you to George, I'm suing him. She said  
3           oh.

4       Q     So if you had the conversation -- you were suing him  
5           at the time that you had the conversation, ma'am?

6       A     I had been suing George every chance I could find  
7           somebody to do it.

8       Q     Okay. So you weren't suing him actively in 2018 so  
9           the conversation that you had with Ms. Montez must  
10          have been in 20 -- at least since 2019 because you  
11          weren't, --

12      A     Could be.

13      Q     -- you weren't suing him in 2018?

14      A     Could be. I told you I'm not good with dates.

15      Q     So is it possible that you could have spoken with him  
16          since this lawsuit was filed?

17      A     Him who?

18      Q     I'm sorry, her, Amor.

19      A     With Nene -- I mean with Amor?

20      Q     Amor Montez?

21      A     No, there's no reason to. Amor's -- no.

22      Q     Okay. What did you tell Amor about the lawsuit that  
23          you filed against Mr. Clinton?

24      A     I said I wouldn't be of much help, sweetheart, I'm  
25          suing George. That was the extent of the

1 conversation.

2 Q So other than your lawyer or lawyers have you  
3 discussed this lawsuit with any other person?

4 A Not that I can think of.

5 Q Pardon for asking a somewhat personal question. Are  
6 you still in contact with your daughter?

7 A My daughter?

8 Q Yes.

9 A Yes.

10 Q Okay. Have you discussed the lawsuit with your  
11 daughter?

12 A No.

13 Q Never?

14 A Only the same thing like I told Amor, that we're suing  
15 George for what he did to Bernie.

16 Q How did it come about that the estate of Bernie  
17 Worrell retained, I believe the name of the firm was  
18 King and Ballow?

19 MR. DAVIS: Ballow.

20 MR. ALLEN: Ballow, yeah.

21 A I don't know. I think I probably asked for a  
22 recommendation. I asked everybody. This was like  
23 such a horrible thing to have done to Bernie. I was  
24 determined that it wasn't going to go -- whatever.

25 Q (Continuing by MR. ALLEN): Who was it that gave you

1 the recommendation for King and Ballow?

2 A I'm not exactly sure. I was talking to a lot of  
3 people.

4 Q Okay. Well, you know that that law firm represented  
5 Mr. Boladian in a prior lawsuit. Is it possible that  
6 Mr. Boladian gave you the recommendation for King and  
7 Ballow?

8 A No, because I wasn't -- I don't talk to Armen.

9 Q Okay. So you just, of all the law firms in Washington  
10 State, decided to hire King and Ballow, which is  
11 located outside of Washington State, to represent your  
12 estate --

13 A No, --

14 Q -- or to represent your husband's estate?

15 A -- no. I think it came about when I was talking to --  
16 trying to get some money, and I was asked how come  
17 you're always out of money and I said because George  
18 Clinton took it all and I said now it's difficult.

19 And I was asked if I had an attorney and I  
20 explained the problem with getting one; when someone  
21 has taken away your money, you don't have the money to  
22 pay for an attorney. Well, what do you want. I said  
23 I want every damn dime that's owed Bernie and not a  
24 penny more. And he said, well, let me check around.  
25 And then I don't know if he contacted me or one of the

1 attorneys did.

2 Q Who's the he that you're referring to?

3 A Joel.

4 Q Who?

5 A Joel.

6 Q Joel who?

7 A Joel Bakow (ph) I think is his last name.

8 Q Joel Bakow?

9 A I don't what his last name is. I always --

10 MR. DAVIS: Publicly known as Joel Martin.

11 A Oh, okay. I always -- that was when I was trying, you  
12 know, to get some advances.

13 Q (Continuing by MR. ALLEN): Okay. And who is Joel  
14 Martin?

15 A He's the one that one day when I was calling Sarah he  
16 answered the phone.

17 Q Sarah being?

18 A Sarah Catlett.

19 Q And who's Sarah Catlett again? I'm sorry, been a lot  
20 of names here. Who's Sarah?

21 A Sarah was the person that I would call when I wanted  
22 an advance. I didn't call Armen, I called whoever  
23 answered the phone. That used to be Helen and then it  
24 became Sarah.

25 Q Okay. So you called Sarah at Bridgeport Music and

1 told her that you wanted to get every penny that was  
2 owed to --

3 A No, I didn't tell her, I -- no. What I said was I  
4 would call when I needed an advance, when I couldn't  
5 wait anymore to pay royalties, when there -- I needed  
6 money. So who answered the phone most of the time  
7 would be Sarah. And then one time Joel answered the  
8 phone and he facilitated it.

9 Q So what agreement do you have with Bridgeport or  
10 Westbound Records with respect to the recovery in this  
11 case, assuming there is one?

12 A Absolutely nothing.

13 Q And it's your testimony that should you prevail in  
14 this lawsuit that your only intention is to use  
15 whatever that recovery is for your benefit and no one  
16 else's?

17 A My children, all the people who've suffered when  
18 George took the money. All the people that Bernie  
19 wanted to do things for; our son, my daughter, my  
20 granddaughters.

21 Q So let's go through the list of people who've suffered  
22 that you want to assist with this case -- or that you  
23 want to help with the proceeds of this case, assuming  
24 there are some?

25 A Why, why do you need to know who I want to help?

1 Q Well, it doesn't really matter why I want to know,  
2 ma'am. I think it has to do with the fact that I'm  
3 entitled to ask the questions and --

4 A Okay.

5 Q -- I'd like to know who they are because that tends to  
6 go to issues like credibility.

7 So start with the first person. You've got  
8 your son Bassl?

9 A Bassl, B-A-S-S-L.

10 Q B-A-S-S-L. Your daughter?

11 A My daughter.

12 Q Okay. What's her name?

13 A Dawn.

14 Q Dawn.

15 A My three granddaughters.

16 Q All right, you'll have to give me their names.

17 A Stephanie.

18 Q All right.

19 A Amber, Taylor. My great-grandson Christian. My  
20 great-granddaughter Alia. My brother Craig. My  
21 sister Eleanor if she's still alive.

22 Q Who else?

23 A That's basically it.

24 Q Well, you've made a lot of allegations in this  
25 Complaint, and you just said that you wanted to help

1 all the people that George Clinton hurt. You made a  
2 lot of allegations about other people in your lawsuits  
3 about who Mr. Clinton has hurt, including  
4 Mr. Boladian. Is he one of the people --

5 A No.

6 Q -- that's on your list?

7 A No, no, no, no, no. What I meant when I said that was  
8 people -- okay, Bernie wanted to move his mother out  
9 of the roach infested place she was in. We wanted to  
10 take our families on a cruise. We wanted to do this  
11 with my -- help my daughter pay for my granddaughter's  
12 and great-granddaughters' college educations. All  
13 kinds of things that we were not able to do because of  
14 your client.

15 Q So how many other advances have you received from  
16 Bridgeport?

17 A None.

18 Q I'm talking about since you made the call to Sarah  
19 about wanting to --

20 A Oh, I don't know, whenever I ran out of money.

21 Q Okay. And how often is that?

22 A Almost every year. As a matter of fact, I'm close to  
23 that point right now.

24 Q So you'll pick up the phone and you'll call Armen and  
25 ask him for --

1 A I don't call Armen. Will you stop that. I don't know  
2 Armen that way.

3 Q You'll call Sarah?

4 A I will call Sarah.

5 Q And has Sarah ever turned you down on an advance?

6 A Sarah doesn't turn anybody down. She forwards my  
7 request to Armen.

8 Q Okay. So has Armen ever turned down one of your  
9 requests --

10 A Never.

11 Q -- for an advance?

12 A Never.

13 Q And approximately how much in advances have you  
14 received from Mr. Armen Boladian, or one of his  
15 companies since 2016?

16 A Since 2016, well, I try not to ask for more than like  
17 two to 5,000 because like I said, I get Bridgeport  
18 royalties in February and in August. So if I ask for  
19 too much money, I'll get less money when the royalties  
20 come in so I try very hard not to.

21 Q So when you say that you ask for 2,000 to \$5,000, how  
22 often is that?

23 A Well, maybe once a year, because once Bernie died I  
24 couldn't -- maybe once a year.

25 Q So your testimony is that on average since 2016 you



1 have asked for advances from Mr. Boladian in the range  
2 of two to \$5,000?

3 A Not every year.

4 Q Okay. So in other years you ask for more or other  
5 years you ask for nothing?

6 A In other years it was not necessary.

7 Q And why was it not necessary?

8 A Because I sold the BMI and ASCAP royalties.

9 Q To whom?

10 A Oh, God, I can't remember. I have to look it up. LL  
11 -- something something, LLC.

12 Q And who did you negotiate this deal to sell your BMI  
13 and ASCAP royalties to?

14 A My attorney, Briana Elzey, handled all that.

15 Q Briana Elzey. And which firm is she with?

16 A She was Briana.

17 Q So she's a solo practitioner?

18 A She was then, I don't think she is now. I think now  
19 she works for Disney, I'm not sure.

20 Q Can you spell Briana's name, is it two N's?

21 A B-R-I-A-N-A, E-L-Z-E-Y.

22 Q E-L-Z-E-Y. And you think she works for Disney now?

23 A I think so.

24 Q Okay. So now that she works for Disney who do you  
25 have that -- she negotiated the sale of your royalties

1 to BMI and ASCAP?

2 A Yes.

3 Q Okay. Nobody else?

4 A She was my attorney. I only needed one.

5 Q I'm just asking, ma'am.

6 A Okay.

7 Q Did you have an accountant that was involved with  
8 that?

9 A No.

10 Q Did she hire an accountant?

11 A No.

12 Q How did she value the royalties that you were selling  
13 to BMI and ASCAP?

14 A Several offers came in. She asked me which one I  
15 wanted, I told her. And she negotiated to make sure  
16 that it was all a good fit for me and my son, 'cause  
17 he's my principal heir.

18 Q And how much did you sell your royalties for, ma'am?  
19 Let's start with BMI royalties.

20 A I don't remember, but I remember the last one was  
21 about a hundred thousand.

22 Q Okay. Well, let's start with the first one and we'll  
23 get to the last one. What was the first payment you  
24 received and from whom for your --

25 A I don't remember.

1 Q Where would those records be?

2 A What records?

3 Q The records memorializing the transactions?

4 A Oh, I have them. You mean the contract between the  
5 company that purchased them and myself?

6 Q Yes.

7 A I have them.

8 Q Okay. And what is the name of the company, to the  
9 best of your recollection?

10 A I remember it's LLC. I have to look up the -- maybe  
11 -- no, wait a minute, I don't have it there.

12 MR. QUICK: Don't worry about it, just  
13 answer to the best of your ability.

14 THE WITNESS: Okay.

15 Q (Continuing by MR. ALLEN): And who, what person, if  
16 any, did you negotiate with in order to get those  
17 royalties sold?

18 A As I said, Briana handled that.

19 Q So you had no interaction with the purchaser  
20 whatsoever?

21 A The offers were made. I sent them to Briana. Briana  
22 looked them over and then negotiated.

23 Q Okay. And you made the decision who you wanted to  
24 sell the royalties to?

25 A Definitely.

1 Q Did you take the highest price or did you have other  
2 criteria for selecting who you would sell your  
3 royalties to?

4 A I took the best deal.

5 Q And to the best of your recollection, let's start with  
6 payments, do you have any recollection -- first of  
7 all, scratch that.

8 Do you recall when this transaction  
9 occurred?

10 A The first one?

11 Q The first one.

12 A About two, three years ago, somewhere in there.

13 Q Okay. So the first time you sold royalties was two to  
14 three years ago?

15 A I think so.

16 Q And was that ASCAP or BMI?

17 A That was BMI.

18 Q And what specifically did you sell?

19 A I'm pretty sure it was the writer catalog.

20 Q And do you recall what the compensa -- or the  
21 consideration was for selling the writer catalog?

22 A No. I remember what it was for ASCAP but I -- two to  
23 three years ago, no, I don't remember.

24 Q Okay. Let's start with -- let's continue with ASCAP.  
25 What did you -- or when did you enter into your

1 arrangement with ASCAP?

2 A About a year after BMI.

3 Q Okay. And what did you sell to ASCAP?

4 A I think it was around a hundred thousand.

5 Q No, what --

6 A Writer's, writer's.

7 Q So you didn't sell the entire writer's catalog to BMI.

8 Well, if you sold it to BMI a year earlier, what was  
9 left for you to sell a year later?

10 A BMI and ASCAP are two separate entities.

11 Q I understand that.

12 A So I sold what ASCAP had and what BMI had. They're  
13 two separate things.

14 Q Got it. And it was writer's catalog?

15 A Yes.

16 Q And who did you sell your ASCAP -- or the --

17 A Same person.

18 Q Same person. And who was that person?

19 A I should say same company. The one that ends in LLC.  
20 I'd have to ask Briana.

21 Q Well, we'll ask Briana for that.

22 A You can do that.

23 Q Yeah. Now let's go through the payments. Other than  
24 the initial \$100,000 that I think you said you got  
25 from ASCAP?

1 A Roughly.

2 Q Okay. What did you receive from BMI?

3 MR. QUICK: Asked and answered. She said  
4 she didn't remember.

5 Q (Continuing by MR. ALLEN): You don't recall?

6 A I don't remember.

7 Q Was it more than a million?

8 A No.

9 Q Was it more than 500,000?

10 A No.

11 Q Was it more than a quarter million?

12 A No.

13 Q Was it more than a hundred thousand dollars?

14 A It was about a hundred or maybe a little less.

15 Q What other consideration did you receive from either  
16 ASCAP or -- I'm sorry, strike that.

17 What other consideration did you receive  
18 from this --

19 A None.

20 Q -- LLC?

21 A None.

22 Q So it was a straight -- the promise was that you were  
23 conveying your interest in the catalog and they were  
24 paying you a hundred thousand dollars, there were no  
25 other stipulations?

1 A That's right.

2 Q So you relinquished all right, title and interest to  
3 the writer's catalog that ASCAP and BMI had?

4 A Yes.

5 Q Do you understand that there is a section in most  
6 commercial contracts of this sort called  
7 representations and warranties? I'm not saying it was  
8 in this one, but do you recall -- do you know what  
9 representations and warranties are in an agreement of  
10 this sort?

11 A Can you be specific?

12 Q Okay. A contract is typically entered into premised  
13 upon certain things being true, okay. And one of the  
14 things that somebody who's selling something does is  
15 make representations about the condition --

16 A Oh, yes, right.

17 Q Do you have any of the representations and warranties  
18 that you made in connection with your sale of these  
19 catalogs?

20 A No, just that it satisfied the sellers -- I mean the  
21 buyers.

22 Q Did you work with anyone from Bridgeport Music on the  
23 sale of the catalogs?

24 A Not the Bridgeport, no.

25 Q With whom did you work other than Briana?

1 A Nobody, she made the deal. Deals came to me, I sent  
2 them to Briana. Briana said which one she thought was  
3 good, the deal was made.

4 Q Okay. So starting with the first deal, BMI, how did  
5 it become known that you were interested in selling  
6 the catalog?

7 A A musician named -- he plays in LA a lot. I, I don't  
8 know him personally, but he got in touch with me and  
9 he said that he knew I needed money, and did I know  
10 that people that were now selling their catalogs, and  
11 he recommended this woman.

12 And so I did some investigation, Briana did  
13 it. And then we found out that wasn't going to be a  
14 good deal for me. At the same time more deals were  
15 coming in. It seemed to be something people were  
16 doing a couple years ago when I thought finally I can  
17 fix my house. And that's how it happened.

18 MR. ALLEN: Okay, it's 2:12 and I'm kind of  
19 hungry and thirsty. Can we do a 30 minute break to go  
20 to the salad bar downstairs at Plum Market?

21 MR. QUICK: How much longer do you think  
22 you have?

23 MR. ALLEN: I'm going to go through some of  
24 the allegations and the former Complaint and the  
25 current Complaint, and perhaps some of the Answers to



1 Interrogatories. And I don't think I have any further  
2 documents that I'll be working with.

3 MR. QUICK: You don't want to just go on,  
4 do you?

5 MR. ALLEN: I have a blood sugar issue too  
6 so I'm kind of crashing here.

7 MR. QUICK: Okay.

8 (WHEREUPON a break was had in  
9 the proceedings 2:12 p.m. to  
10 2:45 p.m.)

11 Q (Continuing by MR. ALLEN): A couple questions I  
12 forgot to ask earlier. You said that the storm that  
13 destroyed the RV occurred when you were in Washington  
14 State, correct?

15 A Yes.

16 Q Okay. Do you recall what year you moved to Washington  
17 State?

18 A 2015.

19 Q Do you recall what month you moved to Washington  
20 State?

21 A August.

22 Q August of 2015. And is your address in Washington  
23 State today the same address that you were at in 2015  
24 when the storm occurred?

25 A No.

1 Q Where was the RV when the storm occurred in August of  
2 2015?

3 MR. QUICK: You mean the address?

4 MR. ALLEN: Yeah.

5 A Everson.

6 Q (Continuing by MR. ALLEN): Everson, Washington?

7 A Everson, Washington.

8 Q And do you have an address for that?

9 A I don't remember the street address. Let me see,  
10 something Van Buren Road.

11 Q Van Buren Road in Everson?

12 A Yes.

13 Q All right, thank you.

14 A You're welcome.

15 Q And, I'm sorry, you probably told me the city.

16 A Everson.

17 Q Everson?

18 A E-V-E-R-S-O-N.

19 Q And Van Buren Road, I'm sorry. And the totality of  
20 documents that were located in the -- the totality of  
21 the documents that were destroyed, they were all  
22 located in the recreational vehicle?

23 A In the RV, yes.

24 Q Whose RV was it?

25 A Ours.

1 Q What type of RV was it?

2 A How do I describe it?

3 Q Brand?

4 A Oh, I don't remember.

5 Q What year was it?

6 A I don't remember that either.

7 Q How long did you have it prior to the storm?

8 A Probably about two years. Bernie had used it to tour  
9 as the Bernie Worrell Orchestra. And when that  
10 disbanded, we just drove west, I did.

11 Q And you took the RV with you?

12 A Definitely. That's what I was driving to get there.

13 Q All right. Was Mr. Worrell with you?

14 A Of course.

15 Q Was anybody else with you?

16 A Our son, two cats, three dogs -- four dogs -- no,  
17 three dogs.

18 Q So did you have a home there at the time or were you  
19 just -- was the motor home parked outside the home, or  
20 were you living in the motor home on the property?

21 A No, when we went to the rental house, we lived in the  
22 rental house.

23 Q So when the storm occurred in August of 2015, --

24 A No, the storm occurred in September. We moved there  
25 in August.

1 Q Got it, all right. So the storm occurred in September  
2 of 2015. Was there insurance on the recreational  
3 vehicle?

4 A Yes, of course.

5 Q Do you recall who was your insurance carrier?

6 A No.

7 Q Okay. Did you make a claim with your insurance  
8 carrier?

9 A Of course.

10 Q If I were looking for the insurance claim for the RV,  
11 would I find any of the information regarding the  
12 claim that you made for the damage to the RV?

13 A Are you asking me if you could figure out who the  
14 insurance company was?

15 Q Yes.

16 A I don't remember.

17 Q Okay. Do you have the same insurance today --

18 A No.

19 Q -- that you did then?

20 A No.

21 Q Okay. Was the insurance from a carrier in New Jersey  
22 or Washington State?

23 A Probably New Jersey.

24 Q Did you have a policy of homeowners insurance on the  
25 rental property?

1 A No.

2 Q Did you have any other insurance that would have  
3 helped to repair any damage created by the storm?

4 A It was total a loss. There was no repair.

5 Q Okay. And you received a check from an insurance  
6 carrier for the loss, correct?

7 A Yes.

8 Q Do you recall what kind of storm it was?

9 A A thunderstorm, lightning, huge, huge.

10 Q Do you recall when in relation to Labor Day it was?

11 A No.

12 Q Is there anything that would --

13 A It might even have been the last week of August. I'm  
14 trying to remember if Bernie was there or if he had  
15 gone out to work. It was between the last week of  
16 August and the first couple of weeks of September, and  
17 that's as close as I can get.

18 Q Okay. And was Mr. Worrell on tour at that time did  
19 you say?

20 A I just said I don't remember if he had gone off to do  
21 some gigs.

22 Q Was he there when the accident occurred?

23 A What accident?

24 Q When the tree fell on the RV.

25 A That's what I just said, I don't remember if he was

1 out on gigs or where he was.

2 Q Who else would know about the storm that, you know,  
3 that could testify?

4 A My son.

5 Q And I don't mean to be indelicate about this. Your  
6 son -- well, your son's coached basketball before,  
7 correct?

8 A Yes.

9 Q Okay. He's active?

10 A Yes.

11 Q And he is in possession of his faculties, correct?

12 A Yes.

13 Q And he was at the time of the accident, correct?

14 A Yes.

15 Q So I understand that he has some physical limitations,  
16 and I apologize if I've said that incorrectly in  
17 politic. But none of that would impair his ability to  
18 testify about that storm, correct?

19 A My son isn't going to testify. I'm not going to allow  
20 that.

21 Q Well, ma'am, we have -- well, we'll take that up  
22 later. The judge will have to determine that if you  
23 object.

24 But assuming that a judge were to rule in  
25 my favor and compel his testimony, is there anything

1           about his, I don't know what the proper terminology --  
2           he has cerebral palsy, correct?

3       A     He has what's called right spastic hemiplegia, which  
4           affects the whole right side of his body with  
5           spasticity. Does he have a mental problem, no, he  
6           does not.

7       Q     Okay. So he -- I'm sorry for having to ask that  
8           question, ma'am. I don't mean to be impolite or  
9           indelicate about it. It's part of my job.

10                   But he's able to accurately recount events  
11           that have occurred in his life, correct?

12       A     If he remembers.

13       Q     Yeah, okay. Did you have to make any telephone calls  
14           or contact emergency services in order to provide  
15           relief during -- in the aftermath of that storm, fire  
16           department, EMS?

17       A     Oh, no, no.

18       Q     Okay. Who was it that removed the tree from --

19       A     Whoever the insurance company arranged it with.

20       Q     Okay. And it's your testimony that you do not have  
21           any of the records related to that?

22       A     No.

23       Q     Okay. Now Exhibit 6 purports to be a Complaint, along  
24           with some exhibits to the Complaint and lawsuit that  
25           the estate of George Bernard Worrell filed versus the

1 same two defendants that I represent, Thang, Inc. and  
2 George Clinton.

3 My question to you is have you -- I  
4 probably already had you identify it, but I'll have  
5 you do it again just for purposes of the record. Have  
6 you seen this Complaint before prior to today?

7 A I don't think so.

8 Q Okay. Are you aware that this is the Complaint that  
9 initiated the lawsuit that was filed in 2019 against  
10 Mr. Clinton --

11 A Yes.

12 Q -- and Thang?

13 And I take it that you had some involvement  
14 in drafting this Complaint and providing  
15 information, --

16 A Not draft --

17 Q -- not the actual drafting, but you provided the  
18 information that made its way into the Complaint at  
19 least in part, correct?

20 A Some of it, yes.

21 Q Did you review a copy of it before it was filed?

22 A Maybe, I don't remember.

23 Q Okay. Is there anything in this Complaint that you  
24 recall having a disagreement with as being accurate?

25 A No.



1 Q In paragraph two you, or the estate -- and I apologize  
2 if sometimes I interchangeably say you.

3 A What page are you on?

4 Q Page two of the Complaint.

5 A Okay.

6 Q The Complaint references in paragraph two that on  
7 information and belief Clinton entered into numerous  
8 agreements prior to 1982 on behalf of defendant Thang.

9 What agreements are you referencing in  
10 paragraph two that Thang entered into prior to 1982,  
11 if you know?

12 A I don't know.

13 Q And on what basis do you make the allegation that  
14 Mr. Clinton is and has been sole owner of Thang?

15 A On what basis?

16 Q Yeah.

17 A 'Cause that's what he said.

18 Q Okay. He said that to you?

19 A I'm pretty sure he was talking to Bernie and I was  
20 there.

21 Q Okay. And is it true that you alleged that the  
22 agreement referenced in paragraph two obligated your  
23 husband to render services as a recording artist,  
24 either individually or as a member of a group in  
25 connection with phonographic records for the term of

1 the agreement?

2 A I think so.

3 Q All right. And it says here in return for his  
4 participation in the creation of phonographic records  
5 Mr. Worrell is to receive ongoing royalty payments  
6 from the records sold on a semi-annual basis to be  
7 accompanied by an accounting by Thang.

8 Do you see that?

9 A No. What paragraph are you at?

10 Q Paragraph three.

11 A Oh, three, all right. So what's the question?

12 Q First question is do you see where I'm reading from?

13 A Now I do.

14 Q Okay, thank you. Do you believe that to be true, that  
15 statement that's contained in paragraph three that I  
16 just read?

17 A Yes, I think so.

18 Q All right. When you say in the next sentence that  
19 Thang is obligated to contract with a third party  
20 record company for the distribution of phonographic  
21 records embodying Mr. Worrell's performances, it  
22 wasn't just Mr. Worrell that was contemplated to be a  
23 performer on the records, was it?

24 A I don't know. I only deal with Bernie, nobody else.

25 Q Okay. But you knew that Mr. Worrell was playing on

1 records with a number of other musicians, right?

2 A Yes.

3 Q You watched that happen, right?

4 A Yes.

5 Q So the phonographic records certainly embodied  
6 Mr. Worrell's performances, but it's your  
7 understanding that they also embodied the performances  
8 of other artists, correct?

9 A I only was concerned with Bernie. I don't know who  
10 else did what.

11 Q I understand that, ma'am, but you listened to the  
12 records, you've given interviews about the records so  
13 you know that the records embodied not just the  
14 performances of your husband, but other musicians?

15 A Yes, but Bernie didn't just perform them either.

16 Q Okay. He composed?

17 A Bernie composed, he was an arranger --

18 Q He wrote?

19 A -- he was a co-producer for which he was never  
20 credited or paid. Anything a musician can do of  
21 Bernie's caliber, Bernie did. He had perfect pitch.

22 Q Okay, great. And you represent that the true and  
23 accurate copy of the contract is attached as Exhibit A  
24 to that Complaint.

25 And that Exhibit A of the Complaint, I

1 believe we've marked as Exhibit 1 or 2 previously --  
2 that would be one, right. Is that the contract that  
3 you're referring to, the one that we've already  
4 attached here as Exhibit 1?

5 A Yeah, if you already attached it to this here.

6 Q To this deposition?

7 A I don't know, you have so many papers.

8 Q Okay. Why don't I show it to you --

9 A Why don't you do that.

10 Q -- if I can find the marked copy.

11 Exhibit 1, is this -- Exhibit 1 to this  
12 deposition, is that the Exhibit A referenced in  
13 paragraph three of the estate's 2019 lawsuit?

14 A Yes.

15 Q Okay. What evidence do you have to support the  
16 allegation in paragraph eight of the Complaint that  
17 defendants continually hide the amount of monies  
18 received under these agreements in violation of the  
19 contractual duties to Mr. Worrell and others?

20 A One thing would be checks that had been written that  
21 said advance against royalties.

22 Q And some of those checks you received from other third  
23 parties like Bridgeport, correct?

24 A No, I'm only talking about George. Got nothing to do  
25 with Bridgeport.

1 Q Okay. But we've already gone through previously the  
2 fact that you complained to the special master in 1996  
3 or '97 that Bridgeport was characterizing things as  
4 royalties that Bridgeport shouldn't have, in your  
5 opinion, characterized as royalties?

6 A I thought we were talking about this. This has  
7 nothing to do with Bridgeport. You asked me about  
8 Clinton.

9 Q Ma'am, I asked you whether or not there were others --  
10 whether there's any other evidence that you have to  
11 support the fact that there was a hiding of monies  
12 received under these agreements.

13 What evidence do you have that Mr. Clinton  
14 hid money under the agreements that he entered into  
15 with record companies; what is your evidence?

16 A The evidence is writing advance against royalties on  
17 checks when they were not advances against royalties.

18 Q Okay. But that has nothing to do with the money that  
19 Mr. Clinton received. That's an issue about how  
20 Mr. Clinton's company disbursed money.

21 So I'm asking you what is your evidence  
22 that Mr. Clinton received monies from agreements that  
23 he entered into with record companies that he hid from  
24 your husband?

25 A The audit.

1 Q Okay. And how exactly did Mr. Clinton hide that  
2 money?

3 A I have no idea. I know it didn't come to Bernie.

4 Q What is your evidence that the money was hidden?

5 A The audit showed that X amount of dollars were paid to  
6 George Clinton. George Clinton turned around and paid  
7 Bernie less than what he was supposed to get. That's  
8 the evidence.

9 Q Ma'am, the audit, with all due respect, does not say  
10 that Mr. Clinton received money that was owed to your  
11 husband. The audit showed that Mr. -- that the monies  
12 received were paid to various entities from various  
13 entities.

14 A When you -- oh, here it is. Again the audit says it.  
15 He was telling us what Bernie was due and didn't get.

16 Q Okay. Where in the audit does it show where  
17 Mr. Clinton received money? If you'd like to look at  
18 the audit, ma'am, --

19 A I'm looking at the audit. I'm trying to find it.

20 Q I don't think you are. It's an exhibit here.

21 MR. QUICK: It's also an exhibit to the  
22 Complaint that you're having her look at.

23 Q (Continuing by MR. ALLEN): All right. So tell me  
24 where on that audit it says that Mr. Clinton received  
25 a penny.

1 A It says Thang, Incorporated.

2 Q Okay. It also says paid to Bernie Worrell?

3 A What page are you on?

4 Q If you're looking at the Complaint, it's 65 of 74 at  
5 the bottom of the Complaint, for one example.

6 A Okay. Okay, and your question again is?

7 Q Where in the audit does it say that Mr. Clinton  
8 received a thing, where?

9 A It only says Thang. It doesn't say George's name.

10 Q Okay. Where does it say that Thang received money?

11 A Throughout the whole thing. Audit of Thang, Malbiz  
12 and Parliament.... Funkadelic, Malbiz. Thang,  
13 Incorporated's receipt of cash advances over and above  
14 royalties earned as shown.

15 So wherever you see the name Thang or  
16 Malbiz, that's George, or Parliament.

17 Q What evidence do you have that Mr. Clinton never had  
18 an interest in Malbiz?

19 A I, as I said umpteen times, have no interest in  
20 anybody but Bernie. So what George did or didn't get,  
21 I don't know. I know what Bernie didn't get.

22 Q So you don't know what Mr. Clinton got?

23 A How would I know?

24 Q Okay, thank you. It's very easy.

25 A I said that to you a couple of times already.

1 Q All right. So you understand that you're suing  
2 Mr. Clinton on the premise that he received money,  
3 right; because he can't pay you what he hasn't  
4 received. If he didn't receive it -- you would agree  
5 with me that if Mr. Clinton has never received monies  
6 improperly, he can't pay that to you for anything that  
7 you're claiming for your husband, right?

8 MR. QUICK: Objection, form, argumentative,  
9 legal conclusion.

10 A Yeah, I'm not a lawyer.

11 Q (Continuing by MR. ALLEN): Okay. So did you ever  
12 attempt to seek, other than through your efforts with  
13 the special master that we've already discussed, have  
14 you ever taken any other action to recoup money that  
15 you believe your husband is owed from any third party?

16 A Any third party?

17 Q Any record company, ma'am, other than, --

18 A No.

19 Q -- other than the ones you've let out of this case  
20 already?

21 A No.

22 Q All right. Have you ever audited the record companies  
23 to determine whether or not they're holding money that  
24 is what you believe your husband's entitled to?

25 A No.



1 Q So you don't have any evidence that the record  
2 companies in this case aren't holding money that is  
3 your husband's money?

4 A No.

5 Q Okay. Now you make an assertion in paragraph nine,  
6 defendants have also failed to make any payments  
7 whatsoever under the agreement beginning in the early  
8 '80's.

9 That's not true, is it?

10 A Yeah, it's true.

11 Q So you've never received any money for your husband's  
12 work --

13 A Well, let's -- I'm sorry, go ahead.

14 Q Well, the allegation is, is that defendants have also  
15 failed to make any, and any is underlined, payments  
16 whatsoever under the agreement.

17 A Is this still paragraph nine?

18 Q Yes, ma'am.

19 A I don't have something underlined.

20 Q Well, it's underlined in the version I have.

21 A Oh, up here?

22 Q Yes.

23 A Okay.

24 Q The word any is underlined.

25 A Uh-huh.

1 Q That's not true, is it?

2 A I'm not sure.

3 Q Okay. Well, it's in your Complaint.

4 A If I said it, then that's what it was.

5 Q Okay. But we've gone through a number of payments  
6 that your client -- or that your deceased husband did  
7 receive.

8 MR. QUICK: Objection, form,  
9 mischaracterizes the evidence and the testimony.  
10 Under the agreement?

11 MR. ALLEN: Dan, yesterday I made a comment  
12 about three words long and you jumped down my throat  
13 before I could even explain to you that I wasn't  
14 following what you were saying. I shut up, okay. I  
15 didn't say another word because I know it's  
16 inappropriate to lead my witness while she's being  
17 cross-examined and suggest answers.

18 Now you've done that continuously today.  
19 It's inappropriate. It's unprofessional and I don't  
20 like it. And if we're going -- if that's going to be  
21 the rule of the day, then the rule will continue  
22 onward and it will be both sides doing it or we'll go  
23 to the judge with it.

24 A So could you repeat the question about number nine?

25 Q (Continuing by MR. ALLEN): Is it not true that

1 defendants, plural, have also failed to make any  
2 payments whatsoever under the agreement beginning in  
3 the early 1980's?

4 A I'm not sure.

5 Q Okay, good enough. What is the current status of the  
6 estate, or the probate case in Washington, regarding  
7 the administration of the estate?

8 A I don't understand the question.

9 Q What have you done recently in terms of filing the --  
10 updating the court as to the assets of the estate?

11 A The will went to probate, they did whatever they did  
12 and it's over. I mean here we are eight years later  
13 since Bernie dialed.

14 Q So your testimony is that the estate, the probate  
15 matter pending in I believe it's Whatnot County?

16 A Whatcom.

17 Q Whatcom County.

18 A It's not pending, it's done.

19 Q Okay. So that case has terminated, correct?

20 A It went to probate. Whatever happens after that, I  
21 don't know what the legal terms are, it's done.

22 Q So are you paying any legal bills --

23 A No.

24 Q -- still?

25 A No, it's done.

1 Q Who paid the legal bills for that estate in the first  
2 place?

3 A What estate?

4 Q The estate of Bernie Worrell.

5 A I don't understand the question. You mean who paid  
6 for the house?

7 Q No. Who paid for the legal fees that the estate  
8 incurred in Whatcom County?

9 A I did.

10 Q Okay.

11 A To have it probated, yes, I did.

12 Q Okay. So were you invoiced?

13 A I probably was.

14 Q Did the invoices contain a statement of services?

15 A I don't remember. Listen, when --

16 Q Ma'am, if you don't remember, you don't remember. I  
17 understand that you may not remember everything.

18 A Well, then I don't remember.

19 Q We don't need a filibuster every time I ask --

20 A I'm not asking a filibuster --

21 MR. QUICK: You don't need to raise your  
22 voice.

23 A Don't be nasty to me --

24 Q (Continuing by MR. ALLEN): I'm not being nasty to  
25 you, ma'am.

1 A -- because I can return that shit.

2 Q Ma'am, I have not used any profanity at all today.

3 A Okay, let's just go to what you want because you're  
4 going to deny -- I'm annoyed, okay. You asked me a  
5 question. I told you it went to probate and you asked  
6 me who paid for it, I told you I did.

7 Q Okay.

8 A Now what else do you want to know?

9 Q I want to know because if you've paid for it, it's  
10 customary that there's a statement of services that's  
11 rendered that is provided to the person paying the  
12 bill.

13 So my question to you is what do you recall  
14 of the invoices, if anything, that you received from  
15 the law firm that administered the estate?

16 A I don't.

17 Q Thank you. What law firm did represent you in that  
18 case?

19 A It was not a law firm, it was a lawyer.

20 Q Okay. And who was that lawyer?

21 A His name was Richard.

22 MR. QUICK: You don't have to look it up.

23 THE WITNESS: He's not even in practice  
24 anymore. What was his name, oh, God. He lived around  
25 the corner from me. I don't remember his name.

1 Q (Continuing by MR. ALLEN): Okay. You make an  
2 allegation in paragraph 16 of the Complaint in New  
3 York that the drafting and negotiation of the  
4 contract, that being Exhibit 1, was negotiated in New  
5 York County, New York. Do you recall making that  
6 allegation?

7 A Yes.

8 Q Okay. And that's because that's where the contract  
9 was in fact negotiated, right?

10 A Yes.

11 Q And I've referenced a Ina Maibach earlier in the  
12 deposition. Does this refresh your recollection as to  
13 whether Ina was in fact involved in the drafting of  
14 that contract?

15 A Which contract?

16 Q Well, the one that was attached to your Complaint.

17 A The 1976?

18 Q Yeah.

19 A I have no idea if George was using Ina Maibach at that  
20 point.

21 Q Okay. You don't recall going to a meeting with Ina  
22 Maibach to negotiate the contract?

23 A Oh, no.

24 Q Because her records that I've shown to you already  
25 indicate that you -- that she and Mr. Worrell met with

1 her regard negotiating of that contract?

2 A She and Bernie --

3 MR. QUICK: It's purposeful and mis --  
4 well, I won't say it's purposeful. It misstates the  
5 earlier evidence, counsel, if you want to recall the  
6 date of that entry.

7 Q (Continuing by MR. ALLEN): Were you present for the  
8 negotiation of the contract?

9 MR. QUICK: Asked and answered hours ago.  
10 Go ahead.

11 A I don't remember.

12 Q (Continuing by MR. ALLEN): You reference in paragraph  
13 19 an oral contract. It says whereby Mr. Worrell was  
14 to be paid \$200 a week for live performances by  
15 Clinton regardless of whether or not Mr. Worrell  
16 performed that week or not.

17 Do you see that?

18 A Yes.

19 Q Okay. So it's your testimony that prior to the  
20 January 1, 1976 agreement there was an oral contract  
21 in place?

22 MR. QUICK: Asked and answered.

23 A For live performances.

24 Q (Continuing by MR. ALLEN): Okay. Paragraph 20 you  
25 reference the initial term of that contract being for

1 one year and then being extended for two years in one  
2 year increments thereafter.

3 Is it your testimony that the January 1,  
4 1976 contract was that you continued -- or that your  
5 husband continued to perform under that contract at  
6 least until 1981 when he signed the --

7 A I don't remember.

8 Q At the end of paragraph 23 it says that the royalty  
9 rate that you claim he was to receive was to be  
10 proportionately reduced depending on the number of  
11 other royalty artists on each composition, and the  
12 number of compositions upon Mr. Worrell performed on a  
13 particular album.

14 Do you see that?

15 A I see that.

16 Q Okay. And you would agree with me that during the run  
17 of the groups that your husband played in, that there  
18 were a number of artists that performed on those  
19 albums, correct?

20 A Yes.

21 Q And is it your testimony that the royalty rate that  
22 was due to your husband was appropriately reduced  
23 proportionately depending on the number of royalty  
24 artists that were part of those --

25 A I don't know.



1 Q -- contracts?

2 A I don't know.

3 Q I'm asking you whether that's your testimony?

4 A Yeah, I guess, if that's what is written here.

5 Q So it would have been appropriate to proportionately  
6 reduce his royalty -- the receipt of royalties based  
7 upon what other musicians may have gotten for the same  
8 tracks, correct?

9 A No.

10 Q Okay. How is that different than the language that's  
11 there?

12 A I don't know how it's negotiated, okay. So I mean if  
13 you're asking me are they -- are there 20 musicians  
14 performing, do they all get the same royalty rate?

15 Q No, I said it's proportionately reduced.

16 A I don't know.

17 Q Okay. And --

18 A That's not something I would be involved in.

19 Q So you wouldn't know whether that was appropriate or  
20 not?

21 A No, it's not something I would be involved in.

22 Q That would be something for your lawyers to determine,  
23 correct?

24 A That's right.

25 Q All right. The statement in paragraph 28 that says as

1 discussed in more detail below, Mr. Worrell sued on  
2 the agreement in 1980 which was eventually settled for  
3 \$20,000, that's true, correct?

4 A I don't remember.

5 Q Okay. Is there any evidence that you have to suggest  
6 that your lawyer either incorrectly or improperly  
7 included that allegation in the Complaint?

8 A I don't remember.

9 Q Did you trust Mr. Busch, was he the lawyer that  
10 drafted this or did he get it for you?

11 A I don't -- yes, I trusted him. He's a lawyer --

12 Q Great lawyer, right?

13 A -- that I hired so I trusted him.

14 Q Great lawyer in your opinion, right?

15 A Of course, I don't hire anything but great lawyers.

16 Q And you trusted that what he put into the Complaint  
17 was true and accurate, correct?

18 A Yes.

19 Q And you still trust that what he put in the  
20 Complaint --

21 A Yes.

22 Q -- was true and accurate, right?

23 So if he put in the Complaint that  
24 Mr. Worrell settled the several hundred thousand  
25 dollar claim that he made after the audit for \$20,000,

1           you don't have any evidence to suggest that that's  
2           false, do you?

3       A     No, I do not.

4       Q     All right. What evidence do you have to suggest that  
5           Mr. Clinton received any remuneration for All The Woo  
6           In The World?

7       A     I don't know what Mr. Clinton or did or did not  
8           receive.

9       Q     Okay. So it could have been zero for all you know,  
10          right?

11      A     I do not know.

12      Q     Okay. Are you aware that Mr. Clinton provided  
13          services on projects that your husband engaged in and  
14          was not compensated for?

15      A     I have no idea what George did or did not get.

16      Q     With respect to any of the works that he created?

17      A     With respect to any of the works that he did --

18      Q     Created. You don't know what Mr. Clinton got --

19      A     No, of course not.

20      Q     -- to this day?

21                   Okay. Paragraph 34 says that on  
22          information and belief Clinton has even sold sample  
23          packs of instrumentals containing Mr. Worrell's  
24          performances --

25      A     What number?

1 Q Paragraph 34.

2 A Okay.

3 Q For the specific use of being sampled in other artists  
4 works. Mr. Worrell has received zero compensation  
5 from the sale of these sample packs, or any use of  
6 master recordings contained in his performances and  
7 derivative of work.

8 What is your evidence that Mr. Clinton  
9 received money for selling sample packs of  
10 instrumentals containing Mr. Worrell's performances?

11 A I don't know what Mr. Clinton did or did not receive.

12 Q And you don't know whether Mr. Clinton sold sample  
13 packs of instrumentals containing your husband's  
14 music?

15 A Yeah, I do.

16 Q Okay.

17 A What was the name of it?

18 Q What is your evidence that Mr. Clinton sold sample  
19 packs that included instrumentals containing your  
20 husband's performances?

21 A Because that's who was selling them.

22 Q Okay. What is your evidence that Mr. Clinton was the  
23 one that was selling these?

24 A I have no idea.

25 Q Okay. So --

1 A I don't think George gets out there and sells CDs and  
2 DVDs by himself, he doesn't do that. He has other  
3 people do that.

4 Q Okay. And what is your evidence that Mr. Clinton  
5 directed third parties to sell those instrumentals --  
6 sample backs of instrumentals to third parties?

7 A What is my evidence?

8 Q Yeah.

9 A Because they were being sold.

10 Q Okay. Did you ever see any contracts --

11 A No.

12 Q -- that Mr. Clinton entered into for the sale of --

13 A I keep telling you I know nothing about George  
14 Clinton, what he did or didn't do except as it  
15 pertains to Bernie. If Bernie didn't receive money,  
16 then I know.

17 Q Okay. So any time your husband didn't receive money  
18 for something it's Mr. Clinton's fault, that's your  
19 testimony?

20 A That's who he thought he was contracted with, with  
21 Thang so that's who he would go to.

22 Q All right. So because of that you believe that  
23 Mr. Clinton is the person that sold sample packs to  
24 third parties?

25 A He either -- no. You says that he did it. No, I'm

1 not saying he personally did it. He caused it to be  
2 done.

3 Q Okay. Well, the allegation, ma'am, is rather clear as  
4 you would expect from Mr. Busch. On information and  
5 belief Clinton has even sold sample packs of  
6 instrumentals containing Mr. Worrell's performances  
7 for specific use.

8 So again what is the evidence that supports  
9 that allegation, documents, statements, whatever?

10 A I forget the name of the company in Michigan that sold  
11 them so maybe you can get that information from  
12 George's company that sold the alb -- the CDs.

13 Q I'm not interested in what Mr. Clinton knows, ma'am.  
14 He's not under oath today. Your lawyer will have  
15 plenty of opportunity to ask him the same kinds of  
16 questions tomorrow. I'm asking you --

17 A What is my proof that Clinton sold them?

18 Q Uh-huh.

19 A If he didn't -- oh, wait a minute, proof, you want  
20 proof. They were sold and nobody would sell something  
21 of George Clinton's without his permission.

22 Q Okay. And what if Mr. Clinton himself didn't have  
23 rights at the time to certain things?

24 A He didn't. He had no right to sell Bernie's music.

25 Q Okay. And which means he didn't have rights to sell

1 his own music, correct?

2 A Oh, no, I can't speak for what George has the rights  
3 to do. He can't -- he didn't have the rights to  
4 Bernie's music, to sample it and then not pay him.

5 Q Okay. Ma'am, but if we have no evidence that it was  
6 Mr. Clinton himself that sold these, then how are you  
7 alleging that it was him that sold them?

8 A You know what, it should have said on information and  
9 belief Clinton or his representatives. That's what it  
10 should have said.

11 Q Okay. But it doesn't --

12 A And/or his representatives.

13 Q It doesn't say that. So that begs the question of  
14 what representatives are you talking about?

15 A Whichever ones he designated.

16 Q Okay. I would like to know what evidence you have  
17 that he had any third party representatives working on  
18 his behalf to sell samples packs?

19 A I don't but they got sold so, you know.

20 Q Okay. So the fact they got sold --

21 A One and one is two.

22 Q So the fact that they got sold is your evidence that  
23 he was the one that sold it and profited from it?

24 A Yes.

25 Q Okay, thank you. Clinton's non-performance of the

1           agreement stems back nearly to its execution,  
2           according to paragraph 35 of that Complaint.

3                       Are you saying that Mr. Clinton never  
4           performed anything and your husband never got anything  
5           for his work with Mr. Clinton under these contracts?

6       A     Are you talking about royalties?

7       Q     I'm talking about non-compliance with the agreement  
8           from the inception.

9       A     I'm not sure how to answer that. He did not perform  
10          to the agreement, even when he supposedly attempted  
11          to, and everybody got cars as royalty payment, they  
12          got repossessed. So I don't know how else to answer  
13          that.

14      Q     Okay. Ma'am, your attorney provided some, not all, of  
15          the income tax filings that you made representing to  
16          the Internal Revenue Service that you've received --  
17          the estate has received payments from, let's start  
18          with Bridgeport Music.

19                       Did Mr. Worrell do any work for Bridgeport  
20          Music that did not involve Mr. Clinton?

21      A     Only if he -- well, Bridgeport, no, not that I can  
22          think of.

23      Q     Okay. So you would agree with me that there was some  
24          performance of the agreement bind into the fact that  
25          you were still -- till you sold the rights, that you



1 received royalties from that work, correct?

2 MR. QUICK: Objection, form,  
3 mischaracterizes the evidence and the testimony.

4 Q (Continuing by MR. ALLEN): You can answer, ma'am.

5 A I don't know.

6 Q So you don't know that your receipt of royalty  
7 payments from Bridgeport Music stemmed from  
8 Mr. Clinton's performance of the agreement that's  
9 Exhibit 1?

10 MR. QUICK: Objection, form, foundation.

11 A I don't know.

12 Q (Continuing by MR. ALLEN): So Mr. Boladian's paying  
13 this money out of the kindness of his heart, or  
14 because Mr. Worrell earned that money according to the  
15 agreement that you and he twice before sued on?

16 A I'm not sure.

17 Q Okay. So the conclusion of the Herzog and Straus  
18 audit was that for the period it covers, in '78 to  
19 '79, was that Mr. Worrell was owed \$293,590.58. And  
20 we've already established that that claim was settled  
21 for \$20,000?

22 A I don't remember.

23 Q Okay. But you remember that your Complaint, which was  
24 filed on behalf of the estate that you run, makes the  
25 claim that the payment for the damages that are set

1           forth in the audit that Mr. Herzog did, that the  
2           result of that was a \$20,000 settlement?

3       A     I don't remember.

4       Q     Okay. Well, then let's look at paragraph 37 and ask  
5           whether you have any information that would tend to  
6           call the truth of that allegation in question.

7                   I'll read the allegation, paragraph 37. As  
8           a result of the Herzog and Straus audit, Mr. Worrell  
9           filed suit against Clinton and Thang in October 1981  
10          for the money identified as owed in the audit. There  
11          was never a final judgment entered in the case on the  
12          merits.

13                   On or about September nine, 1982 a  
14          settlement agreement was reached where Mr. Worrell  
15          accepted \$20,000 in exchange for dismissal of the  
16          litigation, and generally releasing Thang and Clinton  
17          from any claims for monies owed as of the date of the  
18          settlement agreement.

19                   Is that a true statement?

20       A     I'm not sure we ever got the 20,000.

21       Q     Okay. Did you ever file a lawsuit for breach of the  
22           settlement agreement?

23       A     I don't know.

24       Q     So what did you do for the period -- or what did you  
25           or your husband do, more accurately, during the period

1 of 1982 until 1996 -- or until the next time you sued  
2 in I believe 19 -- oh, 1994?

3 A What did he do?

4 Q What did he do in order to -- if he didn't receive the  
5 \$20,000 that was due under the settlement, what did he  
6 do to enforce the settlement?

7 A I don't remember.

8 Q Did he continue to collaborate with Mr. Clinton after  
9 that --

10 A On and off, but basically he was with Talking Heads  
11 then. I mean everybody wanted Bernie.

12 Q Right. Talking Heads that didn't credit Mr. Worrell  
13 for his masterful work on Burning Down The House?

14 A Oh, they did something else.

15 Q Okay. What did they do other than badmouth him during  
16 the documentary that was done on your husband?

17 A Who badmouthed him?

18 Q Tina Weymouth and David Byrne.

19 A Oh, Tina, Tina -- no, no, the people are David Byrne  
20 and Jerry Harrison.

21 Q So what did they do?

22 A They paid Bernie a bonus when the Stop Making Sense  
23 was re-released.

24 Q And what was the bonus?

25 A I don't want to say.

1 Q Well, ma'am, you're under oath and --

2 A I know I'm under oath but I promised them I wouldn't  
3 say anything. And unless my attorney or the judge  
4 tells me that I have to, I don't want to go back on a  
5 promise that I made to somebody. I'm not that person.

6 Q Okay. So you do not want to disclose and you are  
7 willfully refusing to answer my question?

8 A No, I'm not. I just answered it.

9 Q No, ma'am, I asked you what was the bonus and you said  
10 you would not tell me what the bonus is. That's  
11 refusing to answer my question.

12 A I didn't want to disclose it because I made a promise  
13 to them. You want me to break a promise, that's not  
14 how I do.

15 Q I'm sorry, ma'am, --

16 A Now if the judge tells me that I have to do it, then I  
17 will.

18 Q Okay. She may very well do that. But was the bonus  
19 in the form of a financial compensation?

20 A Yes.

21 Q Money?

22 A Yes.

23 Q Okay. And do you recall when that was received?

24 A About two months ago.

25 Q About two months ago?

1 A Yes.

2 Q Okay. And what were the circumstances under which  
3 that payment was made to you --

4 A I don't understand.

5 Q -- 30 years after the song or 40 years after the song  
6 was released?

7 A I'm sorry, say it again.

8 Q What were the circumstances under which they decided  
9 to pay you a bonus for work that your husband had done  
10 40 years earlier?

11 A Well, I just told you a minute ago. They re-released  
12 the documentary.

13 Q And how did that trigger their decision to pay  
14 Mr. Worrell?

15 A Well, I guess they're good people and they realized  
16 what they owed to Bernie and some of the others, which  
17 is why I'm not allowed to talk about it because I  
18 don't know what they paid the others and I don't want  
19 to rock that boat.

20 Q Okay.

21 A They recognized Bernie's contributions.

22 Q Forty years after that.

23 A Oh, no, they recognized it while he was there, believe  
24 me.

25 Q How many copies did All The Woo In The World sell?

1 A I don't know.

2 Q Did it receive a gold record?

3 A I don't know.

4 Q You don't have a platinum record or gold record  
5 hanging in the house; if you did, you wouldn't know  
6 it?

7 A I do not have one hanging in the house. I don't know  
8 if we ever received them. When I called them and  
9 asked to speak to them, they refused to speak to me  
10 because they said the deal was between them and  
11 George. And even though Bernie was the artist, they  
12 would not talk to me.

13 Q So you don't know how many copies All The Woo In The  
14 World has sold?

15 A I just said no.

16 Q And you've already testified that you don't know  
17 whether Mr. Clinton ever received anything for it?

18 A I know nothing about what Mr. Clinton did or did not  
19 receive.

20 Q Is it your position that if a third party, not  
21 connected to Mr. Clinton, stole or improperly used --  
22 let's start with stole. Improperly stole samples and  
23 was paid for it, is it your position that Mr. Clinton  
24 should be responsible for payments that a third party  
25 received for those samples --

1 A I don't know.

2 Q -- inappropriately?

3 MR. QUICK: Objection, form, legal  
4 conclusion, hypothetical.

5 MR. ALLEN: I'm asking -- not asking a  
6 legal conclusion.

7 A I said I don't know.

8 Q (Continuing by MR. ALLEN): You don't know whether you  
9 think it would be inappropriate to go after  
10 Mr. Clinton for money that somebody else stole from  
11 your husband?

12 MR. QUICK: Same objection.

13 A I don't know.

14 Q (Continuing by MR. ALLEN): Okay. As a general  
15 proposition, ma'am, if someone steals money from you  
16 today, is there any recourse that you have against  
17 Mr. Clinton if he had no involvement in that?

18 A I don't know. That's a hypothetical.

19 Q Would you feel it appropriate -- would you sue  
20 Mr. Clinton if somebody stole your car?

21 A Oh, my God. No.

22 Q Okay. And you would agree with me that it is a poor  
23 practice to sue somebody for the acts of another  
24 person, right?

25 A Not necessarily, if they were tied in some kind of

1 way.

2 Q Okay. I'm asking the question if they weren't tied  
3 in.

4 A I have no idea.

5 Q You have no idea about what, whether it would be  
6 appropriate --

7 A Whatever you just asked me.

8 Q Whether it would be appropriate to sue somebody for  
9 something they didn't do?

10 A That's a strange question. If a person believes that  
11 somebody did something, even though they subsequently  
12 found out they didn't, there's two different examples  
13 there. So what are you asking me?

14 Q I'm asking you whether or not it's appropriate for you  
15 to pursue a claim against Mr. Clinton for the wrongful  
16 acts of others?

17 MR. QUICK: Same objection.

18 Q (Continuing by MR. ALLEN): Would you agree with me  
19 that that's inappropriate? And there's no problem --

20 A It may not be, I don't know.

21 Q Okay. If your lawyer does something inappropriate to  
22 you, would it be appropriate for you to sue me, in  
23 your opinion?

24 A It would depend if you were complicit.

25 Q If I wasn't complicit, ma'am.



1 A Well, who's to say that. You're giving me an example  
2 that makes no sense to me.

3 Q I'm saying the Lord Jesus Christ comes down onto the  
4 earth and says Jim Allen had nothing to do with what  
5 Mr. Quick did to you, would that be sufficient for you  
6 to conclude that it would be inappropriate to sue me  
7 for something he did to you?

8 A Probably not. Jesus and I have never met.

9 Q Okay. At paragraph 38, eventually Mr. Worrell refused  
10 to work with defendants because he had written,  
11 composed, produced and performed on nearly all of  
12 Clinton's albums and received zero compensation for  
13 any of the work.

14 That's not true, right?

15 A Some of it is.

16 Q Okay. But the statement itself is false; he did  
17 receive compensation for his work?

18 A Not all of it.

19 Q Ma'am, the word zero is in there, okay.

20 A And so is the word for any of the work. And I'm  
21 saying --

22 Q Right. So --

23 A -- that's not true.

24 Q -- we agree --

25 A No, we don't agree.

1 Q -- the statement in 38 is false?

2 A No, I don't agree with that.

3 Q Okay. So did you falsely report to the Internal  
4 Revenue Service that you received royalties from  
5 Bridgeport Music?

6 A What?

7 Q Ma'am, your attorney has provided us with statements  
8 and schedules to your income tax filings --

9 A Right.

10 Q -- that demonstrate that you've received compensation  
11 for -- or from many others, but we'll go with  
12 Bridgeport here.

13 A Yeah.

14 Q Okay. So you would agree with me that that didn't  
15 come to you as a gift from Sanna (ph) Boladian, did  
16 it?

17 A They're two different things. You're talking apples  
18 and oranges.

19 Q No, ma'am. Is it a false statement that your husband  
20 received zero compensation for any of the work?

21 A He received zero compensation for co-production. He  
22 received -- sometimes he didn't receive compensation  
23 so...

24 Q Okay. But --

25 A Sometimes he did.

1 Q But if he received one penny, the statement zero  
2 compensation is false, correct?

3 A Maybe they should have said zero or very little or  
4 none, I don't know. Because it depends on what you're  
5 talking about. He got zero compensation for all the  
6 co-production he did.

7 Q Ma'am, the statement itself refers to written,  
8 composed, produced and performed. We've established  
9 that your husband received substantial money, and you  
10 just sold his catalog for more than zero dollars, so  
11 we can both agree -- it's not a sin to agree with me  
12 on anything. We can agree that a hundred thousand  
13 dollars is more than zero, right?

14 A That's true.

15 Q Okay. So the fact that he received a hundred -- or  
16 that you received a hundred thousand dollars of  
17 compensation for his catalog means that there was not  
18 zero compensation paid for his work?

19 MR. QUICK: Object to form,  
20 mischaracterizing paragraph 38.

21 A He got zero for production.

22 Q (Continuing by MR. ALLEN): Okay.

23 A I think you're nitpicking the word zero.

24 Q Are you familiar with what the term and means?

25 A Are you familiar with what the word no money for

1 production means?

2 Q That's not what the allegation is, ma'am.

3 A Well, you're nitpicking. I'm not going to agree to  
4 it.

5 Q Well, that's what lawyers are paid to do, ma'am. We  
6 look at the statements that you make and we try to  
7 determine whether there's any truth to them.

8 A Well, I'm helping you out with that by telling you he  
9 got zero compensation for his co-production work.

10 Q Okay. But he received money for his --

11 A So that's partially true. I'll just stipulate it's  
12 partially true.

13 Q All right. Partially true which means that it's  
14 partially false. And in the legal world partially  
15 false is false.

16 A That's your --

17 MR. QUICK: That's not a question, that's a  
18 speech.

19 THE WITNESS: Yeah, I know. That's, that's  
20 ridiculous. I mean he must think I'm an idiot.

21 MR. QUICK: Just, just --

22 THE WITNESS: All right.

23 Q (Continuing by MR. ALLEN): What is your evidence that  
24 Mr. Clinton has a history of fraud, deceit and  
25 delinquency when it comes to performance of contracts

1           that he has entered into on behalf of himself or his  
2           companies, other than your allegations about his  
3           treatment of your husband?

4                   MR. QUICK:  You're referencing paragraph  
5           40?

6                   MR. ALLEN:  Yes.

7   A       Other than his treatment of Bernie what else do you  
8           need?

9   Q       (Continuing by MR. ALLEN):  Well, ma'am, I'm trying to  
10           ascertain if paragraph 40, it implies that there are  
11           others other than your husband, okay.  And so one of  
12           the things that we do is try to determine whether  
13           you're being truthful, not just now but when you file  
14           your Complaint.

15                   So if there's a portion of an allegation in  
16           your Complaint that is false or has no evidence, I'm  
17           entitled to ask you about that, okay.  That's what I'm  
18           doing here, just my job.

19                   So you'll forgive me for having to ask the  
20           question again.  You've already testified, I think,  
21           that you allege Mr. Clinton had a history of fraud,  
22           deceit and delinquency as it relates to your husband.  
23           I'm asking whether or not you have any evidence that  
24           Mr. Clinton engaged in fraud, deceit and delinquency  
25           to others other than your husband?

1 A To others?

2 Q Yes.

3 A I have no knowledge of what he did with other people,  
4 only with Bernie.

5 Q Okay. So the allegations that relate to Jerome  
6 Brailey, Dawn Silva, Dennis Chambers, Grady Thomas,  
7 Rodney Skeets Curtis, you don't have any evidence  
8 about those allegations, do you?

9 A I have nothing to do with anybody except Bernie.

10 Q Thank you.

11 A Not Jerome, not Dawn, not anybody.

12 Q Thank you. I apologize for having to ask you -- or  
13 have you answer the same way, but these are all  
14 different allegations. And I'm asking you about the  
15 allegations that you've pled in -- or that the estate  
16 that you run pled in a legal document in 2019, five  
17 short years ago.

18 Did you ever witness Mr. Clinton go around  
19 and say hey, man, have some to get Grady Thomas?

20 A I have no knowledge of anything with George except  
21 with Bernie. That's why he was not in that  
22 documentary.

23 Q Okay. Was he asked to be in the documentary?

24 A Yes.

25 Q Who asked him?

1 A The producer.

2 Q Who was the producer?

3 A I don't remember his name.

4 Q Was he working for Armen Boladian?

5 A No.

6 Q And the reason you decided -- or the reason -- was it  
7 your decision, his decision or a decision made  
8 together not to appear in the documentary?

9 A By him do you mean Bernie?

10 Q Yes.

11 A Bernie and I talked about it.

12 Q And what was his position?

13 A What I said to Bernie is this is just going to be a  
14 bunch of things about his personal life. I don't care  
15 about George Clinton's lamentable personal life. This  
16 is about business.

17 So we decided that Bernie would not join in  
18 on this because we were only concerned with business,  
19 not whether or not all this other stuff went on.

20 Q Okay. Let's talk about the lamentable personal life.  
21 What about Mr. Clinton's life is, in your opinion,  
22 lamentable?

23 A I'm not commenting on that. I just said we don't  
24 comment on other peoples lamentable personal lives.  
25 It's not what this is about.

1 Q Okay.

2 A It's about business.

3 Q So you would agree there are lamentable things about  
4 your personal life and your husband's personal life  
5 too, right?

6 A Well, nobody's put a halo on me.

7 Q Okay. So some of the allegations you made about drug  
8 use in this --

9 A I didn't make the allegations. You didn't never hear  
10 me say that.

11 Q Ma'am, these are your allegations.

12 A Where?

13 Q You put them in a legal document.

14 A Where, show it to me.

15 Q It's filled with these, ma'am. You --

16 A Where do I say anything about drug use?

17 Q Ma'am, it's right here.

18 A Where, just tell me where and what paragraph.

19 Q Clinton used his ability --

20 A Paragraph, paragraph.

21 Q Paragraph 43. Clinton used his ability as the de  
22 facto drug supplier and the near constant drug use on  
23 tour as a means of controlling the band members and  
24 justifying retaining the majority of the money  
25 received from both royalties and live performances?



1 A And who was being quoted, not Bernie. It's Grady  
2 Thomas that's being quoted. I didn't say that.

3 Q Okay. You didn't say it but you put it in a Complaint  
4 and represented it as true?

5 A Where? No, I did not.

6 Q Okay. So if --

7 A If you're saying that -- this is what you're saying  
8 that I allege is true?

9 Q So you're not alleging that paragraph 43 is true?

10 A No, I'm not saying -- look, I said, I'll say it again  
11 for the 45th time, I do not know what other people  
12 did. I know what Bernie did.

13 Q Okay.

14 A And that's why Bernie was not in that documentary.

15 Q You had a second bite at the apple when you filed this  
16 Complaint here, right; you filed -- that Complaint  
17 wasn't successful in New York so you filed the same  
18 Complaint in this case. Do you recall that?

19 A No, it's not the same Complaint.

20 Q Well, you filed a Complaint --

21 A That's right.

22 Q -- regarding the same damages in this case?

23 A I have no idea what that just meant.

24 Q Here we go, paragraph 40 of your Complaint in New York  
25 reads, Clinton has a history of -- history, we've

1 already been through it.

2 A That's right.

3 Q Paragraph 54 of the present Complaint is that it is  
4 well-documented that Clinton has a history of deceit,  
5 delinquency and you've removed --

6 A You said paragraph 54?

7 Q Paragraph 54 of the present Complaint, ma'am.

8 MR. QUICK: Do you have a copy?

9 MR. ALLEN: I don't have one with me,  
10 unfortunately. I'm more than happy to share it with  
11 you, but I'll read it and then you can tell me whether  
12 you need me to share it with you.

13 Q (Continuing by MR. ALLEN): Paragraph 54 says it is  
14 well-documented that Clinton has a history of deceit  
15 and delinquency -- you were charitable enough to  
16 remove the word fraud from there -- when it comes to  
17 the performance of contracts that he's entered into on  
18 behalf of himself or his companies.

19 Although Clinton did not participate, a  
20 recent documentary entitled Tear The Roof Off strips  
21 away the facade of the Funkadelic and Parliament  
22 collective Euphoria and illustrates the nefarious,  
23 continuous and deceitful actions of Clinton in  
24 relation to these monumental musical acts.

25 Now we can go through the rest to show how

1           they track with this Complaint if you'd like.

2       A     Is there a question?

3       Q     Ma'am, the question is so far back I don't know if our  
4           reporter can find it but...

5       A     You said paragraph 54 and then you began reading a  
6           whole bunch of stuff, and I want to know what it is  
7           you want me to respond to.

8       Q     Right. Well, --

9       A     Because I've already told you Bernie was not part of  
10          that documentary and what they said is what they said.  
11          Bernie did not say that.

12      Q     Is it your testimony today that Mr. Clinton's drug  
13          culture caused many of the band members to become  
14          addicts who had to seek treatment for their addiction  
15          later in life?

16      A     Where are you reading this?

17      Q     I'm reading from page 44 of the New York Complaint  
18          that you have in front of you.

19      A     This one?

20                   MR. QUICK: Paragraph 44.

21      Q     (Continuing by MR. ALLEN): And I'm not asking about  
22          the Complaint. I'm asking you whether it is your  
23          testimony today, and you may look at paragraph 44 --

24      A     I'm looking at it.

25      Q     -- if it will help you.

1                   Is it your testimony today that  
2           Mr. Clinton's drug culture caused many of the band  
3           members to become addicts who had to seek treatment  
4           for their addiction later in life. Mr. Nelson later  
5           in the documentary states he knew he was going to get  
6           involved in it (drug use). They actually encouraged  
7           getting high and all of that kind of thing. And as a  
8           result, I got strung the fuck out. Pardon my use of  
9           profanity, I'm just reading what's on the page. Many  
10          of the band members never recovered and drug addiction  
11          cost them their lives. Clinton manipulated the band  
12          members with drugs and promises which were never kept.

13                   Is it your testimony today that Mr. Clinton  
14          did any of that?

15   A    I never even said that.

16   Q    Okay. So it's not your testimony today that  
17          Mr. Clinton's drug culture caused many band members to  
18          become addicts, is it?

19   A    I have no knowledge.

20   Q    Okay.

21   A    And I didn't say any of this. You're still getting  
22          this from the documentary.

23   Q    I'm getting it from your Complaint which you --

24   A    Which is quoting the documentary.

25   Q    But you've testified that you don't agree with the

1 statement in paragraph 44?

2 A No, I'm not saying that. I said Bernie didn't say  
3 that.

4 Q Okay. Do you agree with the statement contained in  
5 paragraph 44 of the New York Complaint?

6 A It's a possibility.

7 Q Okay. What evidence do you have that Mr. Clinton's  
8 drug culture caused members of the band to become  
9 addicts?

10 MR. QUICK: Asked and answered.

11 A You'll have to ask them.

12 Q (Continuing by MR. ALLEN): Okay. You don't have any  
13 information, though, correct?

14 MR. QUICK: She's told you three times.

15 THE WITNESS: I don't think he hears well.

16 Q (Continuing by MR. ALLEN): No, I hear just find,  
17 ma'am. I'm looking for a straight answer to my  
18 question.

19 A I gave you a straight answer.

20 MR. QUICK: Don't be insulting, counsel.

21 MR. ALLEN: I'm not being insulting. I'm  
22 merely explaining --

23 THE WITNESS: If we're going down this road  
24 again, I'm going to the bathroom.

25 MR. ALLEN: -- what it is I'm looking for.

1 A I already told you Bernie never said anything like  
2 that.

3 Q (Continuing by MR. ALLEN): All right. What evidence  
4 do you have to support the claim that the band members  
5 who survived are suffering severe financial difficulty  
6 despite being part of one of the most successful bands  
7 in the '70's and '80's?

8 A What evidence do I have?

9 Q Uh-huh.

10 A The life that my husband and I and our children had to  
11 live because of what he did. That's my evidence.

12 Q Okay. But the -- ma'am, I know that that's how you  
13 feel --

14 A No, that happens to be business.

15 Q -- but -- okay, ma'am. But the question that I asked  
16 did not pertain to your husband, it pertained -- or to  
17 you or your children. There are other allegations  
18 that don't involve you that you put in the Complaint.

19 I want to know whether you have any  
20 evidence to support the claim in paragraph 45 that  
21 band members survived after suffering severe financial  
22 difficulty, despite being part of one of the most  
23 successful bands of the '70's and '80's?

24 MR. QUICK: Other than Mr. Worrell, is that  
25 your question?

1 MR. ALLEN: Yes.

2 A Again I don't know -- I only dealt with Bernie, okay.  
3 So I have no direct knowledge of -- or proof of what  
4 other people have said, but I can look at the way they  
5 live.

6 Q (Continuing by MR. ALLEN): All right.

7 A Again I can only speak for Bernie.

8 Q Were there any other people that were affiliated with  
9 the band that engaged in activities to promote drug  
10 use amongst other people that you're aware of?

11 A I wouldn't know.

12 Q Okay. Well, you do know about one person that was  
13 involved in promoting drug use in the band?

14 A And that would be?

15 Q Well, promoting drug use period.

16 A That would be?

17 Q Your husband.

18 A Bernie didn't promote drug use.

19 Q Well, he gave you your first joint, did he not?

20 A That's not a drug, number one.

21 Q Oh, that's not a drug?

22 A No.

23 Q Okay.

24 A I don't care what the United States says. It happens  
25 to be an herb and it's used for medicinal purposes.

1 Q And so --

2 A That's why they're busy legalizing it all over the  
3 place.

4 Q All right. So you don't deny that your husband gave  
5 you your first joint?

6 A Of course not.

7 Q Okay.

8 A I do wonder why you're making such a big deal out of a  
9 joint.

10 Q I'm not making a big deal out of it, ma'am, but  
11 apparently -- well...

12 Paragraph 49, the first three words,  
13 without royalty statements, the band members had no  
14 way of knowing how much money was actually coming in,  
15 so on and so forth.

16 Does paragraph 49 apply to anyone other  
17 than, plural, band members; does that apply to any  
18 other members of the band other than Mr. Worrell?

19 A I have no knowledge of anybody but Bernie.

20 Q Okay. So the statement that band members, plural, did  
21 not receive royalty statements, what's the basis of  
22 using the term band members instead of Bernie Worrell?

23 MR. QUICK: Object to form.

24 A I guess your answer is in the first sentence of number  
25 50. And I'm now going to the bathroom.



1 Q (Continuing by MR. ALLEN): Ma'am, I'd appreciate it  
2 if you would complete your answer.

3 A I just did.

4 Q So your answer is that the evidence you have to  
5 support that more than your husband did not receive  
6 royalty statements is the first sentence in paragraph  
7 50?

8 A No. My answer is I do not know what anybody else  
9 received or did not receive except for Bernie.

10 Q Okay.

11 A So I'm going to have --

12 MR. QUICK: Off the record.

13 MR. ALLEN: 4:00.

14 (WHEREUPON a short pause was  
15 had in the proceedings 4:00  
16 p.m. to 4:04 p.m.)

17 MR. QUICK: We have about 30 minutes left.

18 MR. ALLEN: We've taken a few breaks but,  
19 yeah, I should be finished in 30 minutes.

20 Q (Continuing by MR. ALLEN): Turning your attention to  
21 paragraph 57 of the 2019 Complaint. That's 18 -- 6,  
22 sorry.

23 A Are you waiting on me?

24 Q I'm waiting on you, yeah.

25 A Okay, you don't need to wait on me.

1 Q All right. Paragraph 57, ma'am. Oh, I'm sorry,  
2 before we get to 57 let's go to 56. Fifty-six of that  
3 Complaint alleges that Mr. Clinton committed a wrong.  
4 And that is in the third from bottom line of paragraph  
5 56.

6 I'm just trying to get an idea as to  
7 whether the wrong that is referenced in this sentence  
8 is a wrong separate and apart from anything that  
9 you've already testified to today?

10 A I don't think so.

11 Q Thank you. Paragraph 57 there's a claim that Clinton  
12 used Thang as a method to control all royalties,  
13 advances, and monies received from the exploitation of  
14 any sound recording produced by his various groups,  
15 including Parliament and Funkadelic, as a means to  
16 retain the proceeds from the records, and as a way not  
17 to pay or distribute the proceeds to his band members,  
18 including Mr. Worrell.

19 Now I'm assuming from your prior answer  
20 that you're going to tell me that this reference to  
21 other band members, you have no knowledge or  
22 information about what Mr. Clinton did or didn't do  
23 with respect to the other band members as is  
24 referenced in paragraph 57?

25 A That's right.

1 Q Thank you. Now why do you believe that Mr. Clinton  
2 needed Thang as a means to accomplish the ends that  
3 are referenced in paragraph 57?

4 A I have no idea.

5 Q Okay. Do you have any knowledge or information about  
6 the reasons why Mr. Clinton incorporated Thang?

7 A I have no idea.

8 Q Okay. You weren't there when he incorporated Thang?

9 A Of course not.

10 Q You weren't part of any discussions he had with any of  
11 his counsel as to why that might be a good idea or  
12 not?

13 A No.

14 Q Okay. So you don't know the reason sitting here today  
15 why Mr. Clinton created Thang, Inc., do you?

16 A That's what I said.

17 Q All right. The final statement in that paragraph is,  
18 is he then had his band members contracts with him and  
19 Thang in such a way that all money from the records  
20 went directly to Thang, and then he was able to  
21 control how it would be -- it would then be  
22 distributed.

23 Do you see that?

24 A I see that.

25 Q How do you know that Mr. Clinton received all money

1 from records and that it went directly to Thang?

2 A I don't.

3 Q And paragraph 59, I think I know the answer to the  
4 question, it says unlike the majority of the other  
5 band members, Mr. Worrell has a contract with  
6 defendants for royalty payments.

7 The contract that we're referencing in  
8 paragraph 59 is the contract that we had marked as  
9 Exhibit 1, correct?

10 A I think so.

11 Q What do you know about Mr. Clinton's accounting of  
12 royalties?

13 A Nothing.

14 Q So the statement made in paragraph 64 that,  
15 furthermore, Clinton never kept adequate accounting or  
16 records for Mr. Worrell to keep track and determine  
17 what is rightfully owed, you don't know what  
18 Mr. Clinton did to adequately account for monies that  
19 were received, do you?

20 A I only know what Bernie didn't receive. He didn't  
21 receive any accounting or records or money.

22 Q Would you agree with me that your husband and  
23 Mr. Clinton had conversations with each  
24 other about business where you were not present?

25 A I doubt it.

1 Q Okay. Approximately how long -- well, your husband  
2 toured with the band for approximately a decade. I  
3 know that there was a statement that you told him to  
4 tell one of his band mates why he doesn't bring you on  
5 the road, because bringing you on the road was like  
6 bringing sand to the beach?

7 A Yeah, that was funny.

8 Q So you didn't accompany Mr. Worrell on the road all  
9 the time, did you?

10 A I did a lot 'cause he wanted me to.

11 Q But you would agree with me that there was an awful  
12 lot of time that he spent away while you were home  
13 caring for your son and daughter, correct?

14 A I wouldn't say an awful lot of time.

15 Q Okay.

16 A But sometimes, sure.

17 Q So you weren't privy to those discussions that he had  
18 with Mr. Clinton while you weren't there?

19 A What discussions?

20 MR. QUICK: Let me --

21 Q (Continuing by MR. ALLEN): Any discussions. I'm  
22 asking were there discussions that your husband had in  
23 the period of time that he was affiliated with  
24 Mr. Clinton that you would not be privy to?

25 MR. QUICK: Form and foundation.

1 A How would I know that?

2 Q (Continuing by MR. ALLEN): Do you believe it to be  
3 true that your husband had conversations over an  
4 approximate 10 year period of time that you were not  
5 privy to?

6 A I doubt it.

7 Q Okay. You doubt it, but can you state with a degree  
8 of moral certainty that your husband did not have any  
9 conversations with Mr. Clinton outside of your  
10 presence?

11 MR. QUICK: Form and foundation.

12 A I don't know.

13 Q (Continuing by MR. ALLEN): Okay. So then you would  
14 acknowledge that it's possible that there were  
15 communications that occurred between Mr. Worrell  
16 and --

17 A No, I'm not acknowledging that. I said I don't know.  
18 That's not an acknowledgment.

19 Q Oh, all right. So you don't know whether there was or  
20 there wasn't?

21 A I said I don't know.

22 Q All right. Studio work often requires the musicians  
23 and producers to work into the evening hours. Were  
24 you always in the studio with your husband as he was  
25 making music?

1 A I was never in the studio.

2 Q So there are a number of -- pretty much all of the  
3 tracks that are at issue in this case, there are  
4 hundreds of them. I know I have it somewhere, i saw  
5 it yesterday.

6 I'm looking for the list of tracks. For  
7 some reason my copy of the Complaint -- there we go, I  
8 found it.

9 What was your husband's contribution to You  
10 Hit the Nail on the Head?

11 A Outside of -- if he co-wrote it, he also performed it.  
12 And then he would be due publishing, writers and  
13 publishing because -- well, that answers your  
14 question.

15 Q So did you witness your husband performing on You Hit  
16 the Nail on the Head?

17 A You mean in the studio?

18 Q Yeah.

19 A No. Bernie didn't want people in the studio.

20 Q Did you witness your husband performing any track in  
21 the studio?

22 A Bernie did not like people in the studio so, no.

23 Q So your evidence that your husband played on any  
24 studio track would come from your husband, correct?

25 A No, as he would say, let those with ears hear.

1 Q And if someone's ear heard a song and concluded that  
2 Mr. Worrell did not perform on the track, what  
3 evidence do you have to rebut that statement?

4 A Bernie would challenge that because he had what's  
5 known as perfect pitch. He knows every single song he  
6 ever played on.

7 Q I understand that he does. And I have a child with  
8 perfect pitch so I know what that means as well. And  
9 I would just ask you what you, not Mr. Worrell because  
10 he's unfortunately not with us today, what you have as  
11 evidence that your husband played on any of the  
12 specific tracks that you're seeking a royalty for the  
13 sound recordings?

14 A Because that's what he said.

15 Q Okay. Anything else?

16 A What else is needed?

17 Q Okay. So he told you that he played on A Joyful  
18 Process?

19 A He's the only one that played on A Joyful Process.  
20 It's an instrumental.

21 Q Okay.

22 A Even though George took 50 percent of it.

23 Q Did he tell you that he performed on We Hurt Too?

24 A Oh, my God, I don't know each specific song that  
25 Bernie would say he played on.



1 Q Okay. Today you don't know that?

2 A No, today I don't know that.

3 Q Okay. So of the tracks that you have attached to your  
4 Complaint as Exhibit D, how many of them did  
5 Mr. Worrell tell you he played on?

6 A I guess the best way to answer that is whenever you  
7 see his name as co-writer, he played on it.

8 Q Okay. You weren't in the studio so what is the basis  
9 of your conclusion that if his name is -- I'm a  
10 copyrighted, I'm a copyrighted songwriter, I can't  
11 play a lick on any instrument so --

12 A Yeah, unfortunately that's true of a lot of people.

13 Q Right. So the mere fact that I am a credited writer  
14 on music does not mean that I played on the song?

15 A That's true, because he wasn't credited on some songs  
16 that he played on.

17 Q Okay.

18 A Like Atomic Dog.

19 Q Okay. So what about Knee Deep, what's your evidence  
20 that Mr. Worrell played on --

21 A I already answered that. You can go through every  
22 single song and ask me the same question and my  
23 answer's going to be the same.

24 Q And --

25 A Because Bernie said so.

1 Q Because Bernie said so and that's your evidence?

2 A That's all I need.

3 Q Okay, great. And did Mr. Worrell -- do you recall  
4 Mr. Worrell ever telling you that he intended to be a  
5 co-creator on a sound recording?

6 A Bernie didn't speak like that.

7 Q Okay.

8 A You'll have to rephrase that question.

9 Q Okay. What is your evidence of your husband's intent  
10 to be a co-creator on sound recordings when he's sued  
11 Mr. Clinton three previous times and never made that  
12 claim?

13 MR. QUICK: Objection, form, legal  
14 conclusion, argumentative.

15 Q (Continuing by MR. ALLEN): Or two times and once by  
16 you.

17 A You have to ask my attorneys that question. I'm not  
18 sure.

19 Q Well, unfortunately they're not witnesses in the case,  
20 ma'am. I'd just like to know what your --

21 A I'm not a witness to that.

22 Q So you're not a witness to what his intent was?

23 A Bernie's intent was to play music, produce music,  
24 write string arrangements, write horn arrangements, go  
25 in the studio with George, because Bernie has perfect

1 pitch and George can't hear well and so to make the  
2 mixing go well Bernie would be there. That's what I  
3 know.

4 Q Okay, fair enough.

5 MR. ALLEN: If I could have a few minutes  
6 to confer with my clients and all, I'd appreciate it.

7 (WHEREUPON a short pause was  
8 had in the proceedings  
9 4:20-4:26 p.m.)

10 Q (Continuing by MR. ALLEN): I just have a couple of  
11 very simple questions. I'm just going to ask you this  
12 one question. There were a number of times in the  
13 interview you gave with the Truth in Rhythm podcast in  
14 which you referenced the fact that Mr. Worrell did not  
15 want to be a front man for a group?

16 A Right.

17 Q All right. And you he didn't like to sing?

18 A No, he wanted to concentrate on his music.

19 Q Okay. So it's still your belief and your testimony  
20 today that your husband didn't want to be a front man?

21 A No, not at first he did not.

22 Q You said not at first?

23 A Not at first.

24 Q Okay. When was his desire to become a front man  
25 something that he came to realize, probably with your

1 help, later in life as he launched some of his solo  
2 projects?

3 A When Bernie and I re-married and he asked me to be his  
4 manager, because he didn't trust anybody anymore after  
5 what he did to him, I told him, I said in order for  
6 you to do certain things you need to form a group.  
7 The record companies know you're a phenomenal musician  
8 but they don't think you can carry a show; I don't  
9 want to do that. I said, well, think about it and so  
10 he did.

11 Q Okay. And so at that point, after he had severed his  
12 relationship with Mr. Clinton by and large, with your  
13 encouragement he decided that it was a good idea for  
14 him to finally step out in front and be a front man,  
15 correct?

16 A I don't know if he decided it was a good idea but he  
17 agreed to do it.

18 Q Okay. And how many record deals did he get as a front  
19 man for one of his groups?

20 A I don't know. Well, we just released one album, that  
21 was a record deal with Loantaka Records. It's called  
22 Bernie Worrell, Wave from the Wooniverse.

23 Q I enjoyed it.

24 A I'm glad you did.

25 MR. ALLEN: I don't have anything else.

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THE WITNESS: Are we done?

MR. QUICK: You're done.

(WHEREUPON the deposition was  
concluded at approximately  
4:29 p.m.)



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<b>\$10,000</b> [1] - 63:6 <b>\$100,000</b> [1] - 204:24 <b>\$125</b> [1] - 110:24 <b>\$150</b> [1] - 183:16 <b>\$1500</b> [2] - 64:2, 64:10 <b>\$18,083</b> [1] - 93:16 <b>\$19,132</b> [1] - 92:21 <b>\$2,000</b> [2] - 185:14, 185:15 <b>\$2,682.62</b> [1] - 167:6 <b>\$20,000</b> [7] - 63:4, 233:3, 233:25, 240:21, 241:2, 241:15, 242:5 <b>\$200</b> [13] - 11:16, 11:22, 12:24, 13:22, 15:5, 15:6, 15:24, 16:8, 31:19, 31:23, 32:14, 99:12, 230:14 <b>\$293,590.58</b> [1] - 240:19 <b>\$3,552.53</b> [1] - 140:20 <b>\$3,663</b> [1] - 77:8 <b>\$36</b> [1] - 77:7 <b>\$371.95</b> [1] - 77:12 <b>\$4.31</b> [1] - 78:20 <b>\$400</b> [1] - 124:3 <b>\$5,000</b> [3] - 63:8, 199:21, 200:2 <b>\$50</b> [1] - 183:24 <b>\$50,000</b> [1] - 63:2	19:15, 19:21, 25:19, 25:21, 48:4, 48:21, 48:25, 49:6, 50:22, 51:12, 51:25, 53:10, 108:19, 108:21, 113:7, 114:6, 114:17, 115:24, 219:1, 219:4, 219:11, 229:4, 230:20, 231:3, 240:9, 267:9 <b>1-30-81</b> [1] - 3:22 <b>10</b> [11] - 3:8, 3:22, 17:10, 32:1, 37:8, 67:17, 68:11, 91:22, 117:2, 121:23, 269:4 <b>1040</b> [1] - 77:11 <b>109</b> [1] - 3:21 <b>1099s</b> [1] - 73:18 <b>10:05</b> [2] - 46:10, 46:11 <b>11</b> [5] - 3:23, 24:9, 111:20, 119:2 <b>117</b> [1] - 3:22 <b>119</b> [1] - 3:24 <b>11:27</b> [1] - 109:9 <b>11:34</b> [1] - 109:10 <b>12</b> [4] - 3:25, 121:16, 121:22, 123:16 <b>12-10-80</b> [1] - 3:25 <b>12-29-80</b> [1] - 3:23 <b>12-5-1996</b> [1] - 4:3 <b>121</b> [1] - 4:2 <b>129</b> [1] - 4:4 <b>12:17</b> [1] - 138:10 <b>12:26</b> [1] - 138:11 <b>13</b> [3] - 4:3, 129:17, 162:8 <b>138</b> [2] - 4:5, 4:6 <b>14</b> [3] - 4:5, 138:20, 141:12 <b>14-15</b> [1] - 138:16 <b>140</b> [1] - 4:7 <b>141</b> [1] - 4:8 <b>1410</b> [1] - 1:23 <b>15</b> [6] - 4:6, 9:1, 139:7, 139:12, 171:23, 172:17 <b>16</b> [8] - 4:7, 109:25, 110:20, 112:7, 140:6, 140:7, 173:16, 229:2 <b>16th</b> [1] - 109:22 <b>17</b> [4] - 4:8, 141:2, 141:7, 172:17 <b>174</b> [1] - 4:9 <b>178</b> [1] - 4:11 <b>18</b> [7] - 4:9, 107:12, 141:16, 174:15, 174:21, 264:21	<b>18,083</b> [2] - 93:8, 93:11 <b>18th</b> [1] - 174:7 <b>19</b> [9] - 4:10, 33:18, 117:25, 126:21, 145:13, 178:22, 179:3, 230:13, 242:2 <b>1966</b> [2] - 9:2, 9:4 <b>1970's</b> [2] - 78:4, 156:17 <b>1975</b> [1] - 80:24 <b>1976</b> [18] - 3:8, 11:6, 48:4, 48:21, 48:25, 49:7, 50:22, 51:12, 51:25, 53:10, 53:18, 108:19, 108:25, 113:12, 114:13, 229:17, 230:20, 231:4 <b>1979</b> [5] - 3:12, 4:1, 122:3, 125:9, 183:25 <b>198</b> [2] - 158:5, 158:15 <b>1980</b> [11] - 4:1, 37:16, 88:3, 90:10, 111:20, 117:25, 119:10, 121:23, 122:8, 128:22, 233:2 <b>1980's</b> [6] - 70:24, 78:6, 86:6, 116:21, 126:21, 226:3 <b>1981</b> [7] - 20:22, 25:4, 118:2, 118:15, 157:19, 231:6, 241:9 <b>1982</b> [8] - 48:10, 48:12, 118:3, 118:16, 216:8, 216:10, 241:13, 242:1 <b>1984</b> [3] - 3:14, 44:25, 128:14 <b>1990's</b> [1] - 150:7 <b>1993</b> [2] - 33:19, 33:22 <b>1994</b> [2] - 129:13, 242:2 <b>1995</b> [1] - 3:10 <b>1996</b> [4] - 130:12, 131:21, 220:2, 242:1 <b>1997</b> [13] - 138:23, 140:11, 140:17, 141:6, 147:16, 148:5, 148:16, 150:4, 151:10, 153:25, 161:21, 167:4, 171:25 <b>1:20</b> [2] - 174:10, 174:12 <b>1:26</b> [1] - 174:13 <b>1st</b> [1] - 93:25	<b>2</b> [12] - 3:9, 20:24, 21:1, 22:19, 23:13, 25:17, 113:7, 114:4, 158:7, 158:18, 219:1 <b>2,000</b> [2] - 173:17, 199:21 <b>2-19-97</b> [1] - 4:8 <b>2-23</b> [1] - 184:6 <b>2-25-97</b> [1] - 4:7 <b>20</b> [13] - 16:2, 44:25, 75:4, 101:12, 101:16, 147:22, 151:12, 151:20, 189:10, 189:21, 192:10, 230:24, 232:13 <b>20,000</b> [1] - 241:20 <b>200</b> [1] - 31:19 <b>2015</b> [7] - 102:13, 208:18, 208:22, 208:23, 209:2, 210:23, 211:2 <b>2016</b> [14] - 8:5, 9:2, 56:9, 62:15, 67:14, 74:10, 74:12, 76:20, 191:5, 199:15, 199:16, 199:25 <b>2018</b> [3] - 191:6, 192:8, 192:13 <b>2019</b> [14] - 3:15, 22:15, 22:17, 23:12, 25:15, 47:6, 47:11, 75:4, 191:13, 192:10, 215:9, 219:13, 253:16, 264:21 <b>2020</b> [2] - 3:16, 75:4 <b>2023</b> [5] - 67:24, 68:1, 68:6, 68:15, 69:10 <b>2024</b> [7] - 1:14, 5:2, 68:2, 125:10, 128:23, 277:5, 277:15 <b>21</b> [1] - 3:9 <b>211</b> [1] - 1:22 <b>23</b> [1] - 231:8 <b>24</b> [1] - 8:9 <b>247</b> [1] - 185:12 <b>248</b> [1] - 185:13 <b>25th</b> [1] - 140:11 <b>2600</b> [1] - 1:19 <b>27</b> [1] - 5:2 <b>27th</b> [2] - 1:14, 277:5 <b>28</b> [1] - 232:25 <b>2:12</b> [2] - 207:18, 208:9 <b>2:45</b> [1] - 208:10 <b>2nd</b> [2] - 33:17, 33:18	<b>3</b> [4] - 3:10, 33:2, 33:7, 34:25 <b>3,552.23</b> [1] - 173:15 <b>3,552.53</b> [1] - 173:18 <b>3-27-26</b> [1] - 277:20 <b>3-6-97</b> [1] - 4:5 <b>3-7-97</b> [1] - 4:6 <b>30</b> [7] - 147:22, 170:7, 174:4, 207:19, 244:5, 264:17, 264:19 <b>300</b> [1] - 1:19 <b>3086</b> [1] - 277:19 <b>33</b> [1] - 3:11 <b>34</b> [2] - 234:21, 235:1 <b>35</b> [2] - 3:13, 239:2 <b>3663</b> [2] - 77:3, 77:4 <b>37</b> [2] - 241:4, 241:7 <b>38</b> [3] - 248:9, 249:1, 250:20 <b>3rd</b> [1] - 183:25
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